

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**CORE WIRELESS LICENSING  
S.A.R.L.**

**Plaintiff,**

**v.**

**APPLE, INC.,**

**Defendant.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**CIVIL ACTION NO. 6:12-CV-100**

**JURY TRIAL DEMANDED**

**APPLE INC.'S FIRST AMENDED ANSWER,  
DEFENSES AND FIRST AMENDED COUNTERCLAIMS TO  
CORE WIRELESS LICENSING S.A.R.L'S THIRD AMENDED COMPLAINT**

This is Apple Inc.'s ("Apple") responsive pleading under Fed. R. Civ. P. 12, and contains Apple's first amended defenses to the Claims asserted by plaintiff Core Wireless Licensing S.A.R.L. ("Core Wireless") in its Third Amended Complaint, as well as Apple's First Amended Counterclaims.

### **THE PARTIES**

1. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1, and therefore denies the same.

2. Apple admits the allegations in Paragraph 2.

### **JURISDICTION**

3. The allegations in Paragraph 3 state conclusions of law to which no response is required.

4. Apple admits that this Court may exercise personal jurisdiction over Apple. Apple admits that its accused products (which are manufactured and assembled by third parties) are and have been used, offered for sale, sold, and purchased in the Eastern District of Texas. Apple denies the remaining allegations in Paragraph 4.

### **VENUE**

5. Apple admits that venue is proper in this District but denies that venue in this District would be most convenient and denies that it has committed any acts of infringement.

### **FACTUAL ALLEGATIONS**

6. Apple admits that United States Patent No. 6,792,277 ("the '277 patent") is entitled *Arranging Control Signallings In Telecommunications System*; that the '277 patent indicates that it was issued by the United States Patent and Trademark Office ("USPTO") on September 14, 2004; and that an uncertified copy of the '277 patent is attached to the Third Amended Complaint (the "Complaint") as Exhibit 1. Apple lacks knowledge or information

sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '277 patent, and therefore denies the same.

7. Apple admits that United States Patent No. 6,697,347 (“the '347 patent”) is entitled *Method And Apparatus For Controlling Transmission Of Packets In A Wireless Communication System*; that the '347 patent indicates that it was issued by the USPTO on February 24, 2004; and that an uncertified copy of the '347 patent is attached to the Complaint as Exhibit 2. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '347 patent, and therefore denies the same.

8. Apple admits that United States Patent No. 7,447,181 (“the '181 patent”) is entitled *Method And Apparatus For Improving A Mobile Station Cell Change Operation In The General Packet Radio System (GPRS)*; that the '181 patent indicates that it was issued by the USPTO on November 4, 2008; and that an uncertified copy of the '181 patent is attached to the Complaint as Exhibit 3. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '181 patent, and therefore denies the same.

9. Apple admits that United States Patent No. 6,788,959 (“the '959 patent”) is entitled *Method And Apparatus For Transmitting And Receiving Dynamic Configuration Parameters In A Third Generation Cellular Telephone Network*; that the '959 patent indicates that it was issued by the USPTO on September 7, 2004; and that an uncertified copy of the '959 patent is attached to the Complaint as Exhibit 4. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '959 patent, and therefore denies the same.

10. Apple denies that United States Patent No. 7,529,271 (“the ’271 patent”) is entitled *Method And System For Controlling Data Transmission With Connection States*. Apple admits that the ’271 patent indicates that it was issued by the USPTO on May 5, 2009, and that an uncertified copy of the ’271 patent is attached to the Complaint as Exhibit 5. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the ’271 patent, and therefore denies the same.

11. Apple admits that United States Patent No. 6,266,321 (“the ’321 patent”) is entitled *Method For Transmitting Two Parallel Channels Using Code Division And An Apparatus Realizing The Method*; that the ’321 patent indicates that it was issued by the USPTO on July 24, 2001; and that an uncertified copy of the ’321 patent is attached to the Complaint as Exhibit 6. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the ’321 patent, and therefore denies the same.

12. Apple admits that United States Patent No. 6,978,143 (“the ’143 patent”) is entitled *Method And Arrangement For Managing Packet Data Transfer In A Cellular System*; that the ’143 patent indicates that it was issued by the USPTO on December 20, 2005; and that an uncertified copy of the ’143 patent is attached to the Complaint as Exhibit 7. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the ’143 patent, and therefore denies the same.

13. Apple admits that United States Patent No. 7,804,850 (“the ’850 patent”) is entitled *Slow Mac-E For Autonomous Transmission In High Speed Uplink Packet Access (HSUPA) Along With Service Specific Transmission Time Control*; that the ’850 patent indicates that it was issued by the USPTO on September 28, 2010; and that an uncertified copy of the ’850

patent is attached to the Complaint as Exhibit 8. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '850 patent, and therefore denies the same.

14. Apple admits that United States Patent No. 7,817,679 ("the '679 patent") is entitled *Method And A System For Transferring AMR Signaling Frames On Halfrate Channels*; that the '679 patent indicates that it was issued by the USPTO on October 19, 2010; and that an uncertified copy of the '679 patent is attached to the Complaint as Exhibit 9. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '679 patent, and therefore denies the same.

15. Apple admits that United States Patent No. 7,415,045 ("the '045 patent") is entitled *Method And A System For Transferring AMR Signaling Frames On Halfrate Channels*; that the '045 patent indicates that it was issued by the USPTO on August 19, 2008; and that an uncertified copy of the '045 patent is attached to the Complaint as Exhibit 10. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '045 patent, and therefore denies the same.

16. Apple admits that United States Patent No. 6,674,860 ("the '860 patent") is entitled *Method And Arrangement For Managing A Service In A Mobile Communications System*; that the '860 patent indicates that it was issued by the USPTO on January 6, 2004; and that an uncertified copy of the '860 patent is attached to the Complaint as Exhibit 11. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '860 patent, and therefore denies the same.

17. Apple admits that United States Patent No. 7,383,022 ("the '022 patent") is entitled *Mobile Equipment Based Filtering For Packet Radio Service*; that the '022 patent

indicates that it was issued by the USPTO on June 3, 2008; and that an uncertified copy of the '022 patent is attached to the Complaint as Exhibit 12. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '022 patent, and therefore denies the same.

18. Apple admits that United States Patent No. 7,599,664 ("the '664 patent") is entitled *Mobile Equipment Based Filtering For Packet Radio Service (PRS)*; that the '022 patent indicates that it was issued by the USPTO on October 6, 2009; and that an uncertified copy of the '022 patent is attached to the Complaint as Exhibit 13. Apple lacks knowledge or information sufficient to form a belief as to whether Core Wireless is the current owner of all rights, title, and interest in the '664 patent, and therefore denies the same.

19. Apple admits that United States Patent No. 8,259,689 ("the '689 patent") is entitled *Method And Apparatus For Improving A Mobile Station Cell Change Operation In the General Packet Radio System (GPRS)*; that the '689 patent indicates that it was issued by the USPTO on September 2, 2012; that an uncertified copy of the '689 patent is attached to the Complaint as Exhibit 14; and that the '689 patent indicates that its current assignee is Core Wireless Licensing S.a.r.l. Apple lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 19, and therefore denies the same.

## **FIRST COUNT**

### **(Infringement of the '277 patent)**

20. Apple incorporates by reference its responses to Paragraphs 1-19 of this Answer as if fully set forth herein.

21. Apple denies the allegations in Paragraph 21.

22. Apple denies the allegations in Paragraph 22.

23. Apple denies the allegations in Paragraph 23.

24. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 24.

25. Apple denies the allegations in Paragraph 25.

26. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26, and therefore denies the same.

27. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, and therefore denies the same.

28. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28, and therefore denies the same.

29. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29, and therefore denies the same.

30. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30, and therefore denies the same.

31. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31, and therefore denies the same.

32. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32, and therefore denies the same.

33. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33, and therefore denies the same.

34. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34, and therefore denies the same.

35. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35, and therefore denies the same.

36. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36, and therefore denies the same.

37. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37, and therefore denies the same.

38. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38, and therefore denies the same.

39. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39, and therefore denies the same.

40. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40, and therefore denies the same.

41. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41, and therefore denies the same.

42. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42, and therefore denies the same.

43. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43, and therefore denies the same.

44. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44, and therefore denies the same.

45. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45, and therefore denies the same.

46. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46, and therefore denies the same.



47. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47, and therefore denies the same.

48. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48, and therefore denies the same.

49. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49, and therefore denies the same.

50. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50, and therefore denies the same.

51. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51, and therefore denies the same.

52. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52, and therefore denies the same.

53. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53, and therefore denies the same.

54. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54, and therefore denies the same.

55. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55, and therefore denies the same.

56. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56, and therefore denies the same.

57. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57, and therefore denies the same.

58. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58, and therefore denies the same.

59. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59, and therefore denies the same.

60. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60, and therefore denies the same.

61. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61, and therefore denies the same.

62. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62, and therefore denies the same.

63. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63, and therefore denies the same.

64. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64, and therefore denies the same.

65. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65, and therefore denies the same.

66. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66, and therefore denies the same.

67. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67, and therefore denies the same.

68. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68, and therefore denies the same.

69. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69, and therefore denies the same.

70. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70, and therefore denies the same.

71. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71, and therefore denies the same.

72. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72, and therefore denies the same.

73. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73, and therefore denies the same.

74. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74, and therefore denies the same.

75. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75, and therefore denies the same.

76. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76, and therefore denies the same.

77. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77, and therefore denies the same.

78. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78, and therefore denies the same.

79. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79, and therefore denies the same.

80. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 80, and therefore denies the same.

81. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81, and therefore denies the same.

82. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82, and therefore denies the same.

83. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83, and therefore denies the same.

84. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84, and therefore denies the same.

85. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85, and therefore denies the same.

86. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86, and therefore denies the same.

87. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87, and therefore denies the same.

88. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88, and therefore denies the same.

89. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89, and therefore denies the same.

90. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90, and therefore denies the same.

91. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91, and therefore denies the same.

92. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92, and therefore denies the same.

93. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93, and therefore denies the same.

94. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94, and therefore denies the same.

95. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95, and therefore denies the same.

96. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96, and therefore denies the same.

97. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97, and therefore denies the same.

98. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98, and therefore denies the same.

99. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99, and therefore denies the same.

100. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100, and therefore denies the same.

101. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101, and therefore denies the same.

102. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102, and therefore denies the same.

103. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103, and therefore denies the same.

104. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104, and therefore denies the same.

105. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105, and therefore denies the same.

106. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106, and therefore denies the same.

107. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107, and therefore denies the same.

108. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108, and therefore denies the same.

109. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109, and therefore denies the same.

110. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110, and therefore denies the same.

111. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111, and therefore denies the same.

112. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112, and therefore denies the same.

113. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113, and therefore denies the same.

114. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114, and therefore denies the same.

115. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, and therefore denies the same.

116. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116, and therefore denies the same.

117. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117, and therefore denies the same.

118. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118, and therefore denies the same.

119. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119, and therefore denies the same.

120. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120, and therefore denies the same.

121. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121, and therefore denies the same.

122. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122, and therefore denies the same.

123. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123, and therefore denies the same.

124. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124, and therefore denies the same.

125. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125, and therefore denies the same.

126. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126, and therefore denies the same.

127. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127, and therefore denies the same.

128. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128, and therefore denies the same.

129. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129, and therefore denies the same.

130. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130, and therefore denies the same.

131. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131, and therefore denies the same.

132. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132, and therefore denies the same.

133. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133, and therefore denies the same.

134. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134, and therefore denies the same.



135. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135, and therefore denies the same.

136. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136, and therefore denies the same.

137. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137, and therefore denies the same.

138. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138, and therefore denies the same.

139. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139, and therefore denies the same.

140. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140, and therefore denies the same.

141. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 141, and therefore denies the same.

142. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 142, and therefore denies the same.

143. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143, and therefore denies the same.

144. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144, and therefore denies the same.

145. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145, and therefore denies the same.

146. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146, and therefore denies the same.

147. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147, and therefore denies the same.

148. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148, and therefore denies the same.

149. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149, and therefore denies the same.

150. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150, and therefore denies the same.

151. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151, and therefore denies the same.

152. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152, and therefore denies the same.

153. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153, and therefore denies the same.

154. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154, and therefore denies the same.

155. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155, and therefore denies the same.

156. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156, and therefore denies the same.

157. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157, and therefore denies the same.

158. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158, and therefore denies the same.

159. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159, and therefore denies the same.

160. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160, and therefore denies the same.

161. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161, and therefore denies the same.

162. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162, and therefore denies the same.

163. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163, and therefore denies the same.

164. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164, and therefore denies the same.

165. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165, and therefore denies the same.

166. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166, and therefore denies the same.

167. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167, and therefore denies the same.

168. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168, and therefore denies the same.

169. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169, and therefore denies the same.

170. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170, and therefore denies the same.

171. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171, and therefore denies the same.

172. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172, and therefore denies the same.

173. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173, and therefore denies the same.

174. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174, and therefore denies the same.

175. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175, and therefore denies the same.

176. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176, and therefore denies the same.

177. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177, and therefore denies the same.

178. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 178, and therefore denies the same.

179. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179, and therefore denies the same.

180. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180, and therefore denies the same.

181. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181, and therefore denies the same.

182. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182, and therefore denies the same.

183. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183, and therefore denies the same.

184. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184, and therefore denies the same.

185. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185, and therefore denies the same.

186. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186, and therefore denies the same.

187. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187, and therefore denies the same.

188. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188, and therefore denies the same.

189. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189, and therefore denies the same.

190. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190, and therefore denies the same.

191. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191, and therefore denies the same.

192. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192, and therefore denies the same.

193. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193, and therefore denies the same.

194. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194, and therefore denies the same.

195. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195, and therefore denies the same.

196. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196, and therefore denies the same.

197. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197, and therefore denies the same.

198. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198, and therefore denies the same.

199. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199, and therefore denies the same.

200. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200, and therefore denies the same.

201. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201, and therefore denies the same.

202. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202, and therefore denies the same.

203. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203, and therefore denies the same.

204. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204, and therefore denies the same.

205. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205, and therefore denies the same.

206. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206, and therefore denies the same.

207. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207, and therefore denies the same.

208. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208, and therefore denies the same.

209. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209, and therefore denies the same.

210. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210, and therefore denies the same.

211. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211, and therefore denies the same.

212. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212, and therefore denies the same.

213. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213, and therefore denies the same.

214. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214, and therefore denies the same.

215. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215, and therefore denies the same.

216. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216, and therefore denies the same.

217. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217, and therefore denies the same.

218. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218, and therefore denies the same.

219. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219, and therefore denies the same.

220. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220, and therefore denies the same.

221. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221, and therefore denies the same.

222. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222, and therefore denies the same.



223. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223, and therefore denies the same.

224. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224, and therefore denies the same.

225. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225, and therefore denies the same.

226. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226, and therefore denies the same.

227. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227, and therefore denies the same.

228. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228, and therefore denies the same.

229. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229, and therefore denies the same.

230. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230, and therefore denies the same.

231. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231, and therefore denies the same.

232. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232, and therefore denies the same.

233. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233, and therefore denies the same.

234. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234, and therefore denies the same.

235. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235, and therefore denies the same.

236. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236, and therefore denies the same.

237. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237, and therefore denies the same.

238. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238, and therefore denies the same.

239. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239, and therefore denies the same.

240. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240, and therefore denies the same.

241. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241, and therefore denies the same.

242. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242, and therefore denies the same.

243. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243, and therefore denies the same.

244. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244, and therefore denies the same.

245. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245, and therefore denies the same.

246. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246, and therefore denies the same.

247. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247, and therefore denies the same.

248. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248, and therefore denies the same.

249. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249, and therefore denies the same.

250. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250, and therefore denies the same.

251. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 251, and therefore denies the same.

252. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252, and therefore denies the same.

253. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253, and therefore denies the same.

254. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254, and therefore denies the same.

255. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255, and therefore denies the same.

256. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256, and therefore denies the same.

257. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257, and therefore denies the same.

258. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258, and therefore denies the same.

259. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259, and therefore denies the same.

260. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260, and therefore denies the same.

261. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 261, and therefore denies the same.

262. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262, and therefore denies the same.

263. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263, and therefore denies the same.

264. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264, and therefore denies the same.

265. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265, and therefore denies the same.

266. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266, and therefore denies the same.

267. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267, and therefore denies the same.

268. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268, and therefore denies the same.

269. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269, and therefore denies the same.

270. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270, and therefore denies the same.

271. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271, and therefore denies the same.

272. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272, and therefore denies the same.

273. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273, and therefore denies the same.

274. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274, and therefore denies the same.

275. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275, and therefore denies the same.

276. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276, and therefore denies the same.

277. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277, and therefore denies the same.

278. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278, and therefore denies the same.

279. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279, and therefore denies the same.

280. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280, and therefore denies the same.

281. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281, and therefore denies the same.

282. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282, and therefore denies the same.

283. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283, and therefore denies the same.

284. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284, and therefore denies the same.

285. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285, and therefore denies the same.

286. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286, and therefore denies the same.

287. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287, and therefore denies the same.

288. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288, and therefore denies the same.

289. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289, and therefore denies the same.

290. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290, and therefore denies the same.

291. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291, and therefore denies the same.

292. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292, and therefore denies the same.

293. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293, and therefore denies the same.

294. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294, and therefore denies the same.

295. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295, and therefore denies the same.

296. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296, and therefore denies the same.

297. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297, and therefore denies the same.

298. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298, and therefore denies the same.

299. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299, and therefore denies the same.

300. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300, and therefore denies the same.

301. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301, and therefore denies the same.

302. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302, and therefore denies the same.

303. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 303, and therefore denies the same.

304. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304, and therefore denies the same.

305. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305, and therefore denies the same.

306. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306, and therefore denies the same.

307. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307, and therefore denies the same.

308. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308, and therefore denies the same.

309. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309, and therefore denies the same.

310. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310, and therefore denies the same.



311. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311, and therefore denies the same.

312. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312, and therefore denies the same.

313. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313, and therefore denies the same.

314. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314, and therefore denies the same.

315. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315, and therefore denies the same.

316. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316, and therefore denies the same.

317. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317, and therefore denies the same.

318. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318, and therefore denies the same.

319. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319, and therefore denies the same.

320. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320, and therefore denies the same.

321. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321, and therefore denies the same.

322. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 322, and therefore denies the same.

323. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 323, and therefore denies the same.

324. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324, and therefore denies the same.

325. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325, and therefore denies the same.

326. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326, and therefore denies the same.

327. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327, and therefore denies the same.

328. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328, and therefore denies the same.

329. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329, and therefore denies the same.

330. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330, and therefore denies the same.

331. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331, and therefore denies the same.

332. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332, and therefore denies the same.

333. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333, and therefore denies the same.

334. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334, and therefore denies the same.

335. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335, and therefore denies the same.

336. Apple denies the allegations in Paragraph 336.

337. Apple denies the allegations in Paragraph 337.

338. Apple denies the allegations in Paragraph 338.

## **SECOND COUNT**

### **(Infringement of the '347 patent)**

339. Apple incorporates by reference its responses to Paragraphs 1-338 of this Answer as if fully set forth herein.

340. Apple denies the allegations in Paragraph 340.

341. Apple denies the allegations in Paragraph 341.

342. Apple denies the allegations in Paragraph 342.

343. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 343.

344. Apple denies the allegations in Paragraph 344.

345. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345, and therefore denies the same.

346. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346, and therefore denies the same.

347. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347, and therefore denies the same.

348. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348, and therefore denies the same.

349. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349, and therefore denies the same.

350. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350, and therefore denies the same.

351. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351, and therefore denies the same.

352. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352, and therefore denies the same.

353. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353, and therefore denies the same.

354. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354, and therefore denies the same.

355. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355, and therefore denies the same.

356. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356, and therefore denies the same.

357. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357, and therefore denies the same.

358. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358, and therefore denies the same.

359. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 359, and therefore denies the same.

360. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 360, and therefore denies the same.

361. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 361, and therefore denies the same.

362. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362, and therefore denies the same.

363. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 363, and therefore denies the same.

364. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 364, and therefore denies the same.

365. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 365, and therefore denies the same.

366. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 366, and therefore denies the same.

367. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 367, and therefore denies the same.

368. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 368, and therefore denies the same.

369. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 369, and therefore denies the same.

370. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 370, and therefore denies the same.

371. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 371, and therefore denies the same.

372. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372, and therefore denies the same.

373. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373, and therefore denies the same.

374. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374, and therefore denies the same.

375. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375, and therefore denies the same.

376. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376, and therefore denies the same.

377. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377, and therefore denies the same.

378. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378, and therefore denies the same.

379. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379, and therefore denies the same.

380. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380, and therefore denies the same.

381. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381, and therefore denies the same.

382. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382, and therefore denies the same.

383. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383, and therefore denies the same.

384. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384, and therefore denies the same.

385. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385, and therefore denies the same.

386. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386, and therefore denies the same.

387. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387, and therefore denies the same.

388. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388, and therefore denies the same.

389. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389, and therefore denies the same.

390. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390, and therefore denies the same.

391. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391, and therefore denies the same.

392. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 392, and therefore denies the same.

393. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393, and therefore denies the same.

394. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394, and therefore denies the same.

395. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395, and therefore denies the same.

396. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396, and therefore denies the same.

397. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 397, and therefore denies the same.

398. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 398, and therefore denies the same.

399. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399, and therefore denies the same.

400. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400, and therefore denies the same.

401. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 401, and therefore denies the same.



402. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402, and therefore denies the same.

403. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403, and therefore denies the same.

404. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404, and therefore denies the same.

405. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405, and therefore denies the same.

406. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406, and therefore denies the same.

407. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407, and therefore denies the same.

408. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408, and therefore denies the same.

409. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 409, and therefore denies the same.

410. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 410, and therefore denies the same.

411. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411, and therefore denies the same.

412. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 412, and therefore denies the same.

413. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413, and therefore denies the same.

414. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414, and therefore denies the same.

415. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415, and therefore denies the same.

416. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416, and therefore denies the same.

417. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417, and therefore denies the same.

418. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418, and therefore denies the same.

419. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419, and therefore denies the same.

420. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 420, and therefore denies the same.

421. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 421, and therefore denies the same.

422. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 422, and therefore denies the same.

423. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 423, and therefore denies the same.

424. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424, and therefore denies the same.

425. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425, and therefore denies the same.

426. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426, and therefore denies the same.

427. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427, and therefore denies the same.

428. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428, and therefore denies the same.

429. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429, and therefore denies the same.

430. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 430, and therefore denies the same.

431. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431, and therefore denies the same.

432. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432, and therefore denies the same.

433. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 433, and therefore denies the same.

434. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434, and therefore denies the same.

435. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435, and therefore denies the same.

436. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436, and therefore denies the same.

437. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437, and therefore denies the same.

438. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438, and therefore denies the same.

439. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 439, and therefore denies the same.

440. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 440, and therefore denies the same.

441. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 441, and therefore denies the same.

442. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 442, and therefore denies the same.

443. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443, and therefore denies the same.

444. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444, and therefore denies the same.

445. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445, and therefore denies the same.

446. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446, and therefore denies the same.

447. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447, and therefore denies the same.

448. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 448, and therefore denies the same.

449. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449, and therefore denies the same.

450. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450, and therefore denies the same.

451. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451, and therefore denies the same.

452. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452, and therefore denies the same.

453. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453, and therefore denies the same.

454. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454, and therefore denies the same.

455. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455, and therefore denies the same.

456. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456, and therefore denies the same.

457. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457, and therefore denies the same.

458. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458, and therefore denies the same.

459. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459, and therefore denies the same.

460. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460, and therefore denies the same.

461. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461, and therefore denies the same.

462. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 462, and therefore denies the same.

463. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463, and therefore denies the same.

464. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464, and therefore denies the same.

465. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 465, and therefore denies the same.

466. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466, and therefore denies the same.

467. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 467, and therefore denies the same.

468. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468, and therefore denies the same.

469. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 469, and therefore denies the same.

470. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470, and therefore denies the same.

471. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471, and therefore denies the same.

472. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472, and therefore denies the same.

473. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473, and therefore denies the same.

474. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474, and therefore denies the same.

475. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475, and therefore denies the same.

476. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476, and therefore denies the same.

477. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477, and therefore denies the same.

478. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478, and therefore denies the same.

479. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479, and therefore denies the same.

480. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480, and therefore denies the same.

481. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481, and therefore denies the same.

482. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482, and therefore denies the same.

483. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483, and therefore denies the same.

484. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484, and therefore denies the same.

485. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485, and therefore denies the same.

486. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486, and therefore denies the same.

487. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 487, and therefore denies the same.

488. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 488, and therefore denies the same.

489. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489, and therefore denies the same.



490. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490, and therefore denies the same.

491. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 491, and therefore denies the same.

492. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492, and therefore denies the same.

493. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493, and therefore denies the same.

494. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494, and therefore denies the same.

495. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495, and therefore denies the same.

496. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 496, and therefore denies the same.

497. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 497, and therefore denies the same.

498. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 498, and therefore denies the same.

499. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 499, and therefore denies the same.

500. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500, and therefore denies the same.

501. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501, and therefore denies the same.

502. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502, and therefore denies the same.

503. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503, and therefore denies the same.

504. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504, and therefore denies the same.

505. Apple denies the allegations in Paragraph 505.

506. Apple denies the allegations in Paragraph 506.

507. Apple denies the allegations in Paragraph 507.

### **THIRD COUNT**

#### **(Infringement of the '181 patent)**

508. Apple incorporates by reference its responses to Paragraphs 1-507 of this Answer as if fully set forth herein.

509. Apple denies the allegations in Paragraph 509.

510. Apple denies the allegations in Paragraph 510.

511. Apple denies the allegations in Paragraph 511.

512. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 512.

513. Apple denies the allegations in Paragraph 513.

514. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 514, and therefore denies the same.

515. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 515, and therefore denies the same.

516. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 516, and therefore denies the same.

517. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 517, and therefore denies the same.

518. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 518, and therefore denies the same.

519. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519, and therefore denies the same.

520. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520, and therefore denies the same.

521. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 521, and therefore denies the same.

522. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 522, and therefore denies the same.

523. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523, and therefore denies the same.

524. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524, and therefore denies the same.

525. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525, and therefore denies the same.

526. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 526, and therefore denies the same.

527. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527, and therefore denies the same.

528. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 528, and therefore denies the same.

529. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529, and therefore denies the same.

530. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 530, and therefore denies the same.

531. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531, and therefore denies the same.

532. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532, and therefore denies the same.

533. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533, and therefore denies the same.

534. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534, and therefore denies the same.

535. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 535, and therefore denies the same.

536. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 536, and therefore denies the same.

537. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 537, and therefore denies the same.

538. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538, and therefore denies the same.

539. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 539, and therefore denies the same.

540. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 540, and therefore denies the same.

541. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, and therefore denies the same.

542. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 542, and therefore denies the same.

543. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 543, and therefore denies the same.

544. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 544, and therefore denies the same.

545. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 545, and therefore denies the same.

546. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 546, and therefore denies the same.

547. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 547, and therefore denies the same.

548. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548, and therefore denies the same.

549. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 549, and therefore denies the same.

550. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 550, and therefore denies the same.

551. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551, and therefore denies the same.

552. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552, and therefore denies the same.

553. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553, and therefore denies the same.

554. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554, and therefore denies the same.

555. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 555, and therefore denies the same.

556. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 556, and therefore denies the same.

557. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557, and therefore denies the same.

558. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558, and therefore denies the same.

559. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559, and therefore denies the same.

560. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 560, and therefore denies the same.

561. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561, and therefore denies the same.

562. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 562, and therefore denies the same.

563. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563, and therefore denies the same.

564. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 564, and therefore denies the same.

565. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 565, and therefore denies the same.

566. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566, and therefore denies the same.

567. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567, and therefore denies the same.

568. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568, and therefore denies the same.

569. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569, and therefore denies the same.

570. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570, and therefore denies the same.

571. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 571, and therefore denies the same.

572. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572, and therefore denies the same.

573. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573, and therefore denies the same.

574. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574, and therefore denies the same.

575. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575, and therefore denies the same.

576. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576, and therefore denies the same.

577. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577, and therefore denies the same.

578. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 578, and therefore denies the same.

579. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 579, and therefore denies the same.

580. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 580, and therefore denies the same.



581. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 581, and therefore denies the same.

582. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582, and therefore denies the same.

583. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583, and therefore denies the same.

584. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584, and therefore denies the same.

585. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585, and therefore denies the same.

586. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586, and therefore denies the same.

587. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587, and therefore denies the same.

588. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588, and therefore denies the same.

589. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589, and therefore denies the same.

590. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590, and therefore denies the same.

591. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591, and therefore denies the same.

592. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592, and therefore denies the same.

593. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593, and therefore denies the same.

594. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594, and therefore denies the same.

595. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595, and therefore denies the same.

596. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596, and therefore denies the same.

597. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597, and therefore denies the same.

598. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598, and therefore denies the same.

599. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599, and therefore denies the same.

600. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600, and therefore denies the same.

601. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601, and therefore denies the same.

602. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602, and therefore denies the same.

603. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603, and therefore denies the same.

604. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604, and therefore denies the same.

605. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605, and therefore denies the same.

606. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606, and therefore denies the same.

607. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607, and therefore denies the same.

608. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608, and therefore denies the same.

609. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609, and therefore denies the same.

610. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610, and therefore denies the same.

611. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611, and therefore denies the same.

612. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 612, and therefore denies the same.

613. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613, and therefore denies the same.

614. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614, and therefore denies the same.

615. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615, and therefore denies the same.

616. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616, and therefore denies the same.

617. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617, and therefore denies the same.

618. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618, and therefore denies the same.

619. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619, and therefore denies the same.

620. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620, and therefore denies the same.

621. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621, and therefore denies the same.

622. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622, and therefore denies the same.

623. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623, and therefore denies the same.

624. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624, and therefore denies the same.

625. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625, and therefore denies the same.

626. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626, and therefore denies the same.

627. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627, and therefore denies the same.

628. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628, and therefore denies the same.

629. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629, and therefore denies the same.

630. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630, and therefore denies the same.

631. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631, and therefore denies the same.

632. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632, and therefore denies the same.

633. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633, and therefore denies the same.

634. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634, and therefore denies the same.

635. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635, and therefore denies the same.

636. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636, and therefore denies the same.

637. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637, and therefore denies the same.

638. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638, and therefore denies the same.

639. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639, and therefore denies the same.

640. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640, and therefore denies the same.

641. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641, and therefore denies the same.

642. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642, and therefore denies the same.

643. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643, and therefore denies the same.

644. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644, and therefore denies the same.

645. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645, and therefore denies the same.

646. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646, and therefore denies the same.

647. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647, and therefore denies the same.

648. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648, and therefore denies the same.

649. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649, and therefore denies the same.

650. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650, and therefore denies the same.

651. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651, and therefore denies the same.

652. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652, and therefore denies the same.

653. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653, and therefore denies the same.

654. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654, and therefore denies the same.

655. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655, and therefore denies the same.

656. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656, and therefore denies the same.

657. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657, and therefore denies the same.

658. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658, and therefore denies the same.

659. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659, and therefore denies the same.

660. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 660, and therefore denies the same.

661. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661, and therefore denies the same.

662. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662, and therefore denies the same.

663. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663, and therefore denies the same.

664. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 664, and therefore denies the same.

665. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 665, and therefore denies the same.

666. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666, and therefore denies the same.

667. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667, and therefore denies the same.

668. Apple denies the allegations in Paragraph 668.

669. Apple denies the allegations in Paragraph 669.

670. Apple denies the allegations in Paragraph 670.



#### **FOURTH COUNT**

##### **(Infringement of the '959 patent)**

671. Apple incorporates by reference its responses to Paragraphs 1-670 of this Answer as if fully set forth herein.

672. Apple denies the allegations in Paragraph 672.

673. Apple denies the allegations in Paragraph 673.

674. Apple denies the allegations in Paragraph 674.

675. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 675.

676. Apple denies the allegations in Paragraph 676.

677. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677, and therefore denies the same.

678. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 678, and therefore denies the same.

679. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679, and therefore denies the same.

680. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680, and therefore denies the same.

681. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681, and therefore denies the same.

682. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682, and therefore denies the same.

683. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683, and therefore denies the same.

684. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 684, and therefore denies the same.

685. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685, and therefore denies the same.

686. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686, and therefore denies the same.

687. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687, and therefore denies the same.

688. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688, and therefore denies the same.

689. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689, and therefore denies the same.

690. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690, and therefore denies the same.

691. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691, and therefore denies the same.

692. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692, and therefore denies the same.

693. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693, and therefore denies the same.

694. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 694, and therefore denies the same.

695. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695, and therefore denies the same.

696. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696, and therefore denies the same.

697. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697, and therefore denies the same.

698. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 698, and therefore denies the same.

699. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 699, and therefore denies the same.

700. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700, and therefore denies the same.

701. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 701, and therefore denies the same.

702. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 702, and therefore denies the same.

703. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 703, and therefore denies the same.

704. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 704, and therefore denies the same.

705. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705, and therefore denies the same.

706. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 706, and therefore denies the same.

707. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 707, and therefore denies the same.

708. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 708, and therefore denies the same.

709. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709, and therefore denies the same.

710. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 710, and therefore denies the same.

711. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 711, and therefore denies the same.

712. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712, and therefore denies the same.

713. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 713, and therefore denies the same.

714. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 714, and therefore denies the same.

715. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 715, and therefore denies the same.

716. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 716, and therefore denies the same.

717. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 717, and therefore denies the same.

718. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718, and therefore denies the same.

719. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 719, and therefore denies the same.

720. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 720, and therefore denies the same.

721. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721, and therefore denies the same.

722. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 722, and therefore denies the same.

723. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 723, and therefore denies the same.

724. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724, and therefore denies the same.

725. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725, and therefore denies the same.

726. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 726, and therefore denies the same.

727. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 727, and therefore denies the same.

728. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 728, and therefore denies the same.

729. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 729, and therefore denies the same.

730. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 730, and therefore denies the same.

731. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731, and therefore denies the same.

732. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 732, and therefore denies the same.

733. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733, and therefore denies the same.

734. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734, and therefore denies the same.

735. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735, and therefore denies the same.

736. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 736, and therefore denies the same.

737. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737, and therefore denies the same.

738. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738, and therefore denies the same.

739. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739, and therefore denies the same.

740. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740, and therefore denies the same.

741. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741, and therefore denies the same.

742. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 742, and therefore denies the same.

743. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743, and therefore denies the same.

744. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744, and therefore denies the same.

745. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745, and therefore denies the same.

746. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746, and therefore denies the same.

747. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 747, and therefore denies the same.

748. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 748, and therefore denies the same.

749. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749, and therefore denies the same.

750. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750, and therefore denies the same.

751. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751, and therefore denies the same.

752. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752, and therefore denies the same.

753. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 753, and therefore denies the same.

754. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 754, and therefore denies the same.

755. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 755, and therefore denies the same.

756. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 756, and therefore denies the same.

757. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 757, and therefore denies the same.

758. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 758, and therefore denies the same.

759. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 759, and therefore denies the same.

760. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 760, and therefore denies the same.



761. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 761, and therefore denies the same.

762. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 762, and therefore denies the same.

763. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 763, and therefore denies the same.

764. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 764, and therefore denies the same.

765. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 765, and therefore denies the same.

766. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 766, and therefore denies the same.

767. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 767, and therefore denies the same.

768. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 768, and therefore denies the same.

769. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 769, and therefore denies the same.

770. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 770, and therefore denies the same.

771. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 771, and therefore denies the same.

772. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 772, and therefore denies the same.

773. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 773, and therefore denies the same.

774. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 774, and therefore denies the same.

775. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 775, and therefore denies the same.

776. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 776, and therefore denies the same.

777. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 777, and therefore denies the same.

778. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 778, and therefore denies the same.

779. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 779, and therefore denies the same.

780. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 780, and therefore denies the same.

781. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 781, and therefore denies the same.

782. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 782, and therefore denies the same.

783. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 783, and therefore denies the same.

784. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 784, and therefore denies the same.

785. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 785, and therefore denies the same.

786. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 786, and therefore denies the same.

787. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 787, and therefore denies the same.

788. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 788, and therefore denies the same.

789. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 789, and therefore denies the same.

790. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 790, and therefore denies the same.

791. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 791, and therefore denies the same.

792. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 792, and therefore denies the same.

793. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 793, and therefore denies the same.

794. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 794, and therefore denies the same.

795. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 795, and therefore denies the same.

796. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 796, and therefore denies the same.

797. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 797, and therefore denies the same.

798. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 798, and therefore denies the same.

799. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 799, and therefore denies the same.

800. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 800, and therefore denies the same.

801. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 801, and therefore denies the same.

802. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 802, and therefore denies the same.

803. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 803, and therefore denies the same.

804. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 804, and therefore denies the same.

805. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 805, and therefore denies the same.

806. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 806, and therefore denies the same.

807. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 807, and therefore denies the same.

808. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 808, and therefore denies the same.

809. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 809, and therefore denies the same.

810. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 810, and therefore denies the same.

811. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 811, and therefore denies the same.

812. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 812, and therefore denies the same.

813. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 813, and therefore denies the same.

814. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 814, and therefore denies the same.

815. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 815, and therefore denies the same.

816. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 816, and therefore denies the same.

817. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 817, and therefore denies the same.

818. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 818, and therefore denies the same.

819. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 819, and therefore denies the same.

820. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 820, and therefore denies the same.

821. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 821, and therefore denies the same.

822. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 822, and therefore denies the same.

823. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 823, and therefore denies the same.

824. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 824, and therefore denies the same.

825. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 825, and therefore denies the same.

826. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 826, and therefore denies the same.

827. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 827, and therefore denies the same.

828. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 828, and therefore denies the same.

829. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 829, and therefore denies the same.

830. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 830, and therefore denies the same.

831. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 831, and therefore denies the same.

832. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 832, and therefore denies the same.

833. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 833, and therefore denies the same.

834. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 834, and therefore denies the same.

835. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 835, and therefore denies the same.

836. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 836, and therefore denies the same.

837. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 837, and therefore denies the same.

838. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 838, and therefore denies the same.

839. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 839, and therefore denies the same.

840. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 840, and therefore denies the same.

841. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 841, and therefore denies the same.

842. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 842, and therefore denies the same.

843. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 843, and therefore denies the same.

844. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 844, and therefore denies the same.

845. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 845, and therefore denies the same.

846. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 846, and therefore denies the same.

847. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 847, and therefore denies the same.

848. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 848, and therefore denies the same.



849. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 849, and therefore denies the same.

850. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 850, and therefore denies the same.

851. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 851, and therefore denies the same.

852. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 852, and therefore denies the same.

853. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 853, and therefore denies the same.

854. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 854, and therefore denies the same.

855. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 855, and therefore denies the same.

856. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 856, and therefore denies the same.

857. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 857, and therefore denies the same.

858. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 858, and therefore denies the same.

859. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 859, and therefore denies the same.

860. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 860, and therefore denies the same.

861. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 861, and therefore denies the same.

862. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 862, and therefore denies the same.

863. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 863, and therefore denies the same.

864. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 864, and therefore denies the same.

865. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 865, and therefore denies the same.

866. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 866, and therefore denies the same.

867. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 867, and therefore denies the same.

868. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 868, and therefore denies the same.

869. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 869, and therefore denies the same.

870. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 870, and therefore denies the same.

871. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 871, and therefore denies the same.

872. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 872, and therefore denies the same.

873. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 873, and therefore denies the same.

874. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 874, and therefore denies the same.

875. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 875, and therefore denies the same.

876. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 876, and therefore denies the same.

877. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 877, and therefore denies the same.

878. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 878, and therefore denies the same.

879. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 879, and therefore denies the same.

880. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 880, and therefore denies the same.

881. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 881, and therefore denies the same.

882. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 882, and therefore denies the same.

883. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 883, and therefore denies the same.

884. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 884, and therefore denies the same.

885. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 885, and therefore denies the same.

886. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 886, and therefore denies the same.

887. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 887, and therefore denies the same.

888. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 888, and therefore denies the same.

889. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 889, and therefore denies the same.

890. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 890, and therefore denies the same.

891. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 891, and therefore denies the same.

892. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 892, and therefore denies the same.

893. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 893, and therefore denies the same.

894. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 894, and therefore denies the same.

895. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 895, and therefore denies the same.

896. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 896, and therefore denies the same.

897. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 897, and therefore denies the same.

898. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 898, and therefore denies the same.

899. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 899, and therefore denies the same.

900. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 900, and therefore denies the same.

901. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 901, and therefore denies the same.

902. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 902, and therefore denies the same.

903. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 903, and therefore denies the same.

904. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 904, and therefore denies the same.

905. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 905, and therefore denies the same.

906. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 906, and therefore denies the same.

907. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 907, and therefore denies the same.

908. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 908, and therefore denies the same.

909. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 909, and therefore denies the same.

910. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 910, and therefore denies the same.

911. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 911, and therefore denies the same.

912. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 912, and therefore denies the same.

913. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 913, and therefore denies the same.

914. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 914, and therefore denies the same.

915. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 915, and therefore denies the same.

916. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 916, and therefore denies the same.

917. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 917, and therefore denies the same.

918. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 918, and therefore denies the same.

919. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 919, and therefore denies the same.

920. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 920, and therefore denies the same.

921. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 921, and therefore denies the same.

922. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 922, and therefore denies the same.

923. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 923, and therefore denies the same.

924. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 924, and therefore denies the same.

925. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 925, and therefore denies the same.

926. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 926, and therefore denies the same.

927. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 927, and therefore denies the same.

928. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 928, and therefore denies the same.

929. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 929, and therefore denies the same.

930. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 930, and therefore denies the same.

931. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 931, and therefore denies the same.

932. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 932, and therefore denies the same.

933. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 933, and therefore denies the same.

934. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 934, and therefore denies the same.

935. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 935, and therefore denies the same.

936. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 936, and therefore denies the same.



937. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 937, and therefore denies the same.

938. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 938, and therefore denies the same.

939. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 939, and therefore denies the same.

940. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 940, and therefore denies the same.

941. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 941, and therefore denies the same.

942. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 942, and therefore denies the same.

943. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 943, and therefore denies the same.

944. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 944, and therefore denies the same.

945. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 945, and therefore denies the same.

946. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 946, and therefore denies the same.

947. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 947, and therefore denies the same.

948. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 948, and therefore denies the same.

949. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 949, and therefore denies the same.

950. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 950, and therefore denies the same.

951. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 951, and therefore denies the same.

952. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 952, and therefore denies the same.

953. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 953, and therefore denies the same.

954. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 954, and therefore denies the same.

955. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 955, and therefore denies the same.

956. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 956, and therefore denies the same.

957. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 957, and therefore denies the same.

958. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 958, and therefore denies the same.

959. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 959, and therefore denies the same.

960. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 960, and therefore denies the same.

961. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 961, and therefore denies the same.

962. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 962, and therefore denies the same.

963. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 963, and therefore denies the same.

964. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 964, and therefore denies the same.

965. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 965, and therefore denies the same.

966. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 966, and therefore denies the same.

967. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 967, and therefore denies the same.

968. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 968, and therefore denies the same.

969. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 969, and therefore denies the same.

970. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 970, and therefore denies the same.

971. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 971, and therefore denies the same.

972. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 972, and therefore denies the same.

973. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 973, and therefore denies the same.

974. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 974, and therefore denies the same.

975. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 975, and therefore denies the same.

976. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 976, and therefore denies the same.

977. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 977, and therefore denies the same.

978. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 978, and therefore denies the same.

979. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 979, and therefore denies the same.

980. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 980, and therefore denies the same.

981. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 981, and therefore denies the same.

982. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 982, and therefore denies the same.

983. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 983, and therefore denies the same.

984. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 984, and therefore denies the same.

985. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 985, and therefore denies the same.

986. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 986, and therefore denies the same.

987. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 987, and therefore denies the same.

988. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 988, and therefore denies the same.

989. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 989, and therefore denies the same.

990. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 990, and therefore denies the same.

991. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 991, and therefore denies the same.

992. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 992, and therefore denies the same.

993. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 993, and therefore denies the same.

994. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 994, and therefore denies the same.

995. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 995, and therefore denies the same.

996. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 996, and therefore denies the same.

997. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 997, and therefore denies the same.

998. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 998, and therefore denies the same.

999. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 999, and therefore denies the same.

1000. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1000, and therefore denies the same.

1001. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1001, and therefore denies the same.

1002. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1002, and therefore denies the same.

1003. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1003, and therefore denies the same.

1004. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1004, and therefore denies the same.

1005. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1005, and therefore denies the same.

1006. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1006, and therefore denies the same.

1007. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1007, and therefore denies the same.

1008. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1008, and therefore denies the same.

1009. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1009, and therefore denies the same.

1010. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1010, and therefore denies the same.

1011. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1011, and therefore denies the same.

1012. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1012, and therefore denies the same.

1013. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1013, and therefore denies the same.

1014. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1014, and therefore denies the same.

1015. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1015, and therefore denies the same.

1016. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1016, and therefore denies the same.

1017. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1017, and therefore denies the same.

1018. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1018, and therefore denies the same.

1019. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1019, and therefore denies the same.

1020. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1020, and therefore denies the same.

1021. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1021, and therefore denies the same.

1022. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1022, and therefore denies the same.

1023. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1023, and therefore denies the same.

1024. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1024, and therefore denies the same.



1025. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1025, and therefore denies the same.

1026. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1026, and therefore denies the same.

1027. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1027, and therefore denies the same.

1028. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1028, and therefore denies the same.

1029. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1029, and therefore denies the same.

1030. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1030, and therefore denies the same.

1031. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1031, and therefore denies the same.

1032. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1032, and therefore denies the same.

1033. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1033, and therefore denies the same.

1034. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1034, and therefore denies the same.

1035. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1035, and therefore denies the same.

1036. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1036, and therefore denies the same.

1037. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1037, and therefore denies the same.

1038. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1038, and therefore denies the same.

1039. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1039, and therefore denies the same.

1040. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1040, and therefore denies the same.

1041. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1041, and therefore denies the same.

1042. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1042, and therefore denies the same.

1043. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1043, and therefore denies the same.

1044. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1044, and therefore denies the same.

1045. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1045, and therefore denies the same.

1046. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1046, and therefore denies the same.

1047. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1047, and therefore denies the same.

1048. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1048, and therefore denies the same.

1049. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1049, and therefore denies the same.

1050. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1050, and therefore denies the same.

1051. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1051, and therefore denies the same.

1052. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1052, and therefore denies the same.

1053. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1053, and therefore denies the same.

1054. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1054, and therefore denies the same.

1055. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1055, and therefore denies the same.

1056. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1056, and therefore denies the same.

1057. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1057, and therefore denies the same.

1058. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1058, and therefore denies the same.

1059. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1059, and therefore denies the same.

1060. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1060, and therefore denies the same.

1061. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1061, and therefore denies the same.

1062. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1062, and therefore denies the same.

1063. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1063, and therefore denies the same.

1064. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1064, and therefore denies the same.

1065. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1065, and therefore denies the same.

1066. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1066, and therefore denies the same.

1067. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1067, and therefore denies the same.

1068. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1068, and therefore denies the same.

1069. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1069, and therefore denies the same.

1070. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1070, and therefore denies the same.

1071. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1071, and therefore denies the same.

1072. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1072, and therefore denies the same.

1073. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1073, and therefore denies the same.

1074. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1074, and therefore denies the same.

1075. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1075, and therefore denies the same.

1076. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1076, and therefore denies the same.

1077. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1077, and therefore denies the same.

1078. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1078, and therefore denies the same.

1079. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1079, and therefore denies the same.

1080. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1080, and therefore denies the same.

1081. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1081, and therefore denies the same.

1082. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1082, and therefore denies the same.

1083. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1083, and therefore denies the same.

1084. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1084, and therefore denies the same.

1085. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1085, and therefore denies the same.

1086. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1086, and therefore denies the same.

1087. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1087, and therefore denies the same.

1088. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1088, and therefore denies the same.

1089. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1089, and therefore denies the same.

1090. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1090, and therefore denies the same.

1091. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1091, and therefore denies the same.

1092. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1092, and therefore denies the same.

1093. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1093, and therefore denies the same.

1094. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1094, and therefore denies the same.

1095. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1095, and therefore denies the same.

1096. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1096, and therefore denies the same.

1097. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1097, and therefore denies the same.

1098. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1098, and therefore denies the same.

1099. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1099, and therefore denies the same.

1100. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1100, and therefore denies the same.

1101. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1101, and therefore denies the same.

1102. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1102, and therefore denies the same.

1103. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1103, and therefore denies the same.

1104. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1104, and therefore denies the same.

1105. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1105, and therefore denies the same.

1106. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1106, and therefore denies the same.

1107. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1107, and therefore denies the same.

1108. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1108, and therefore denies the same.

1109. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1109, and therefore denies the same.

1110. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1110, and therefore denies the same.

1111. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1111, and therefore denies the same.

1112. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1112, and therefore denies the same.



1113. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1113, and therefore denies the same.

1114. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1114, and therefore denies the same.

1115. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1115, and therefore denies the same.

1116. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1116, and therefore denies the same.

1117. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1117, and therefore denies the same.

1118. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1118, and therefore denies the same.

1119. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1119, and therefore denies the same.

1120. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1120, and therefore denies the same.

1121. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1121, and therefore denies the same.

1122. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1122, and therefore denies the same.

1123. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1123, and therefore denies the same.

1124. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1124, and therefore denies the same.

1125. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1125, and therefore denies the same.

1126. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1126, and therefore denies the same.

1127. Apple denies the allegations in Paragraph 1127.

1128. Apple denies the allegations in Paragraph 1128.

1129. Apple denies the allegations in Paragraph 1129.

#### **FIFTH COUNT**

##### **(Infringement of the '271 patent)**

1130. Apple incorporates by reference its responses to Paragraphs 1-1129 of this Answer as if fully set forth herein.

1131. Apple denies the allegations in Paragraph 1131.

1132. Apple denies the allegations in Paragraph 1132.

1133. Apple denies the allegations in Paragraph 1133.

1134. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1134.

1135. Apple denies the allegations in Paragraph 1135.

1136. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1136, and therefore denies the same.

1137. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1137, and therefore denies the same.

1138. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1138, and therefore denies the same.

1139. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1139, and therefore denies the same.

1140. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1140, and therefore denies the same.

1141. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1141, and therefore denies the same.

1142. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1142, and therefore denies the same.

1143. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1143, and therefore denies the same.

1144. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1144, and therefore denies the same.

1145. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1145, and therefore denies the same.

1146. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1146, and therefore denies the same.

1147. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1147, and therefore denies the same.

1148. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1148, and therefore denies the same.

1149. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1149, and therefore denies the same.

1150. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1150, and therefore denies the same.

1151. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1151, and therefore denies the same.

1152. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1152, and therefore denies the same.

1153. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1153, and therefore denies the same.

1154. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1154, and therefore denies the same.

1155. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1155, and therefore denies the same.

1156. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1156, and therefore denies the same.

1157. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1157, and therefore denies the same.

1158. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1158, and therefore denies the same.

1159. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1159, and therefore denies the same.

1160. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1160, and therefore denies the same.

1161. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1161, and therefore denies the same.

1162. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1162, and therefore denies the same.

1163. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1163, and therefore denies the same.

1164. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1164, and therefore denies the same.

1165. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1165, and therefore denies the same.

1166. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1166, and therefore denies the same.

1167. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1167, and therefore denies the same.

1168. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1168, and therefore denies the same.

1169. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1169, and therefore denies the same.

1170. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1170, and therefore denies the same.

1171. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1171, and therefore denies the same.

1172. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1172, and therefore denies the same.

1173. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1173, and therefore denies the same.

1174. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1174, and therefore denies the same.

1175. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1175, and therefore denies the same.

1176. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1176, and therefore denies the same.

1177. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1177, and therefore denies the same.

1178. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1178, and therefore denies the same.

1179. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1179, and therefore denies the same.

1180. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1180, and therefore denies the same.

1181. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1181, and therefore denies the same.

1182. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1182, and therefore denies the same.

1183. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1183, and therefore denies the same.

1184. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1184, and therefore denies the same.

1185. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1185, and therefore denies the same.

1186. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1186, and therefore denies the same.

1187. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1187, and therefore denies the same.

1188. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1188, and therefore denies the same.

1189. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1189, and therefore denies the same.

1190. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1190, and therefore denies the same.

1191. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1191, and therefore denies the same.

1192. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1192, and therefore denies the same.

1193. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1193, and therefore denies the same.

1194. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1194, and therefore denies the same.

1195. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1195, and therefore denies the same.

1196. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1196, and therefore denies the same.

1197. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1197, and therefore denies the same.

1198. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1198, and therefore denies the same.

1199. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1199, and therefore denies the same.

1200. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1200, and therefore denies the same.

1201. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1201, and therefore denies the same.

1202. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1202, and therefore denies the same.

1203. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1203, and therefore denies the same.



1204. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1204, and therefore denies the same.

1205. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1205, and therefore denies the same.

1206. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1206, and therefore denies the same.

1207. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1207, and therefore denies the same.

1208. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1208, and therefore denies the same.

1209. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1209, and therefore denies the same.

1210. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1210, and therefore denies the same.

1211. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1211, and therefore denies the same.

1212. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1212, and therefore denies the same.

1213. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1213, and therefore denies the same.

1214. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1214, and therefore denies the same.

1215. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1215, and therefore denies the same.

1216. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1216, and therefore denies the same.

1217. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1217, and therefore denies the same.

1218. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1218, and therefore denies the same.

1219. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1219, and therefore denies the same.

1220. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1220, and therefore denies the same.

1221. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1221, and therefore denies the same.

1222. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1222, and therefore denies the same.

1223. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1223, and therefore denies the same.

1224. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1224, and therefore denies the same.

1225. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1225, and therefore denies the same.

1226. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1226, and therefore denies the same.

1227. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1227, and therefore denies the same.

1228. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1228, and therefore denies the same.

1229. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1229, and therefore denies the same.

1230. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1230, and therefore denies the same.

1231. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1231, and therefore denies the same.

1232. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1232, and therefore denies the same.

1233. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1233, and therefore denies the same.

1234. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1234, and therefore denies the same.

1235. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1235, and therefore denies the same.

1236. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1236, and therefore denies the same.

1237. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1237, and therefore denies the same.

1238. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1238, and therefore denies the same.

1239. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1239, and therefore denies the same.

1240. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1240, and therefore denies the same.

1241. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1241, and therefore denies the same.

1242. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1242, and therefore denies the same.

1243. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1243, and therefore denies the same.

1244. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1244, and therefore denies the same.

1245. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1245, and therefore denies the same.

1246. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1246, and therefore denies the same.

1247. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1247, and therefore denies the same.

1248. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1248, and therefore denies the same.

1249. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1249, and therefore denies the same.

1250. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1250, and therefore denies the same.

1251. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1251, and therefore denies the same.

1252. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1252, and therefore denies the same.

1253. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1253, and therefore denies the same.

1254. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1254, and therefore denies the same.

1255. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1255, and therefore denies the same.

1256. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1256, and therefore denies the same.

1257. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1257, and therefore denies the same.

1258. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1258, and therefore denies the same.

1259. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1259, and therefore denies the same.

1260. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1260, and therefore denies the same.

1261. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1261, and therefore denies the same.

1262. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1262, and therefore denies the same.

1263. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1263, and therefore denies the same.

1264. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1264, and therefore denies the same.

1265. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1265, and therefore denies the same.

1266. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1266, and therefore denies the same.

1267. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1267, and therefore denies the same.

1268. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1268, and therefore denies the same.

1269. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1269, and therefore denies the same.

1270. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1270, and therefore denies the same.

1271. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1271, and therefore denies the same.

1272. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1272, and therefore denies the same.

1273. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1273, and therefore denies the same.

1274. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1274, and therefore denies the same.

1275. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1275, and therefore denies the same.

1276. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1276, and therefore denies the same.

1277. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1277, and therefore denies the same.

1278. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1278, and therefore denies the same.

1279. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1279, and therefore denies the same.

1280. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1280, and therefore denies the same.

1281. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1281, and therefore denies the same.

1282. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1282, and therefore denies the same.

1283. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1283, and therefore denies the same.

1284. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1284, and therefore denies the same.

1285. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1285, and therefore denies the same.

1286. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1286, and therefore denies the same.

1287. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1287, and therefore denies the same.

1288. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1288, and therefore denies the same.

1289. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1289, and therefore denies the same.

1290. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1290, and therefore denies the same.

1291. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1291, and therefore denies the same.



1292. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1292, and therefore denies the same.

1293. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1293, and therefore denies the same.

1294. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1294, and therefore denies the same.

1295. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1295, and therefore denies the same.

1296. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1296, and therefore denies the same.

1297. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1297, and therefore denies the same.

1298. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1298, and therefore denies the same.

1299. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1299, and therefore denies the same.

1300. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1300, and therefore denies the same.

1301. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1301, and therefore denies the same.

1302. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1302, and therefore denies the same.

1303. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1303, and therefore denies the same.

1304. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1304, and therefore denies the same.

1305. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1305, and therefore denies the same.

1306. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1306, and therefore denies the same.

1307. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1307, and therefore denies the same.

1308. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1308, and therefore denies the same.

1309. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1309, and therefore denies the same.

1310. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1310, and therefore denies the same.

1311. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1311, and therefore denies the same.

1312. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1312, and therefore denies the same.

1313. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1313, and therefore denies the same.

1314. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1314, and therefore denies the same.

1315. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1315, and therefore denies the same.

1316. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1316, and therefore denies the same.

1317. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1317, and therefore denies the same.

1318. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1318, and therefore denies the same.

1319. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1319, and therefore denies the same.

1320. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1320, and therefore denies the same.

1321. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1321, and therefore denies the same.

1322. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1322, and therefore denies the same.

1323. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1323, and therefore denies the same.

1324. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1324, and therefore denies the same.

1325. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1325, and therefore denies the same.

1326. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1326, and therefore denies the same.

1327. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1327, and therefore denies the same.

1328. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1328, and therefore denies the same.

1329. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1329, and therefore denies the same.

1330. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1330, and therefore denies the same.

1331. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1331, and therefore denies the same.

1332. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1332, and therefore denies the same.

1333. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1333, and therefore denies the same.

1334. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1334, and therefore denies the same.

1335. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1335, and therefore denies the same.

1336. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1336, and therefore denies the same.

1337. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1337, and therefore denies the same.

1338. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1338, and therefore denies the same.

1339. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1339, and therefore denies the same.

1340. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1340, and therefore denies the same.

1341. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1341, and therefore denies the same.

1342. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1342, and therefore denies the same.

1343. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1343, and therefore denies the same.

1344. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1344, and therefore denies the same.

1345. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1345, and therefore denies the same.

1346. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1346, and therefore denies the same.

1347. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1347, and therefore denies the same.

1348. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1348, and therefore denies the same.

1349. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1349, and therefore denies the same.

1350. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1350, and therefore denies the same.

1351. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1351, and therefore denies the same.

1352. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1352, and therefore denies the same.

1353. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1353, and therefore denies the same.

1354. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1354, and therefore denies the same.

1355. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1355, and therefore denies the same.

1356. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1356, and therefore denies the same.

1357. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1357, and therefore denies the same.

1358. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1358, and therefore denies the same.

1359. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1359, and therefore denies the same.

1360. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1360, and therefore denies the same.

1361. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1361, and therefore denies the same.

1362. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1362, and therefore denies the same.

1363. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1363, and therefore denies the same.

1364. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1364, and therefore denies the same.

1365. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1365, and therefore denies the same.

1366. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1366, and therefore denies the same.

1367. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1367, and therefore denies the same.

1368. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1368, and therefore denies the same.

1369. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1369, and therefore denies the same.

1370. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1370, and therefore denies the same.

1371. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1371, and therefore denies the same.

1372. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1372, and therefore denies the same.

1373. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1373, and therefore denies the same.

1374. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1374, and therefore denies the same.

1375. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1375, and therefore denies the same.

1376. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1376, and therefore denies the same.

1377. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1377, and therefore denies the same.

1378. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1378, and therefore denies the same.

1379. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1379, and therefore denies the same.



1380. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1380, and therefore denies the same.

1381. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1381, and therefore denies the same.

1382. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1382, and therefore denies the same.

1383. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1383, and therefore denies the same.

1384. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1384, and therefore denies the same.

1385. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1385, and therefore denies the same.

1386. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1386, and therefore denies the same.

1387. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1387, and therefore denies the same.

1388. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1388, and therefore denies the same.

1389. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1389, and therefore denies the same.

1390. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1390, and therefore denies the same.

1391. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1391, and therefore denies the same.

1392. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1392, and therefore denies the same.

1393. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1393, and therefore denies the same.

1394. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1394, and therefore denies the same.

1395. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1395, and therefore denies the same.

1396. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1396, and therefore denies the same.

1397. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1397, and therefore denies the same.

1398. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1398, and therefore denies the same.

1399. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1399, and therefore denies the same.

1400. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1400, and therefore denies the same.

1401. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1401, and therefore denies the same.

1402. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1402, and therefore denies the same.

1403. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1403, and therefore denies the same.

1404. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1404, and therefore denies the same.

1405. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1405, and therefore denies the same.

1406. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1406, and therefore denies the same.

1407. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1407, and therefore denies the same.

1408. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1408, and therefore denies the same.

1409. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1409, and therefore denies the same.

1410. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1410, and therefore denies the same.

1411. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1411, and therefore denies the same.

1412. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1412, and therefore denies the same.

1413. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1413, and therefore denies the same.

1414. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1414, and therefore denies the same.

1415. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1415, and therefore denies the same.

1416. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1416, and therefore denies the same.

1417. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1417, and therefore denies the same.

1418. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1418, and therefore denies the same.

1419. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph X, and therefore denies the same.

1420. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1420, and therefore denies the same.

1421. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1421, and therefore denies the same.

1422. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1422, and therefore denies the same.

1423. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1423, and therefore denies the same.

1424. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1424, and therefore denies the same.

1425. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1425, and therefore denies the same.

1426. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1426, and therefore denies the same.

1427. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1427, and therefore denies the same.

1428. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1428, and therefore denies the same.

1429. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1429, and therefore denies the same.

1430. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1430, and therefore denies the same.

1431. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1431, and therefore denies the same.

1432. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1432, and therefore denies the same.

1433. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1433, and therefore denies the same.

1434. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1434, and therefore denies the same.

1435. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1435, and therefore denies the same.

1436. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1436, and therefore denies the same.

1437. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1437, and therefore denies the same.

1438. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1438, and therefore denies the same.

1439. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1439, and therefore denies the same.

1440. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1440, and therefore denies the same.

1441. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1441, and therefore denies the same.

1442. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1442, and therefore denies the same.

1443. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1443, and therefore denies the same.

1444. Apple denies the allegations in Paragraph 1444.

1445. Apple denies the allegations in Paragraph 1445.

1446. Apple denies the allegations in Paragraph 1446.

## **SIXTH COUNT**

### **(Infringement of the '321 patent)**

1447. Apple incorporates by reference its responses to Paragraphs 1-1446 of this Answer as if fully set forth herein.

1448. Apple denies the allegations in Paragraph 1448.

1449. Apple denies the allegations in Paragraph 1449.

1450. Apple denies the allegations in Paragraph 1450.

1451. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1451.

1452. Apple denies the allegations in Paragraph 1452.

1453. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1453, and therefore denies the same.

1454. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1454, and therefore denies the same.

1455. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1455, and therefore denies the same.

1456. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1456, and therefore denies the same.

1457. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1457, and therefore denies the same.

1458. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1458, and therefore denies the same.

1459. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1459, and therefore denies the same.

1460. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1460, and therefore denies the same.

1461. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1461, and therefore denies the same.

1462. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1462, and therefore denies the same.

1463. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1463, and therefore denies the same.

1464. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1464, and therefore denies the same.

1465. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1465, and therefore denies the same.

1466. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1466, and therefore denies the same.

1467. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1467, and therefore denies the same.

1468. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1468, and therefore denies the same.

1469. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1469, and therefore denies the same.

1470. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1470, and therefore denies the same.



1471. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1471, and therefore denies the same.

1472. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1472, and therefore denies the same.

1473. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1473, and therefore denies the same.

1474. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1474, and therefore denies the same.

1475. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1475, and therefore denies the same.

1476. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1476, and therefore denies the same.

1477. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1477, and therefore denies the same.

1478. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1478, and therefore denies the same.

1479. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1479, and therefore denies the same.

1480. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1480, and therefore denies the same.

1481. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1481, and therefore denies the same.

1482. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1482, and therefore denies the same.

1483. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1483, and therefore denies the same.

1484. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1484, and therefore denies the same.

1485. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1485, and therefore denies the same.

1486. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1486, and therefore denies the same.

1487. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1487, and therefore denies the same.

1488. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1488, and therefore denies the same.

1489. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1489, and therefore denies the same.

1490. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1490, and therefore denies the same.

1491. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1491, and therefore denies the same.

1492. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1492, and therefore denies the same.

1493. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1493, and therefore denies the same.

1494. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1494, and therefore denies the same.

1495. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1495, and therefore denies the same.

1496. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1496, and therefore denies the same.

1497. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1497, and therefore denies the same.

1498. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1498, and therefore denies the same.

1499. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1499, and therefore denies the same.

1500. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1500, and therefore denies the same.

1501. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1501, and therefore denies the same.

1502. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1502, and therefore denies the same.

1503. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1503, and therefore denies the same.

1504. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1504, and therefore denies the same.

1505. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1505, and therefore denies the same.

1506. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1506, and therefore denies the same.

1507. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1507, and therefore denies the same.

1508. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1508, and therefore denies the same.

1509. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1509, and therefore denies the same.

1510. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1510, and therefore denies the same.

1511. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1511, and therefore denies the same.

1512. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1512, and therefore denies the same.

1513. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1513, and therefore denies the same.

1514. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1514, and therefore denies the same.

1515. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1515, and therefore denies the same.

1516. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1516, and therefore denies the same.

1517. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1517, and therefore denies the same.

1518. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1518, and therefore denies the same.

1519. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1519, and therefore denies the same.

1520. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1520, and therefore denies the same.

1521. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1521, and therefore denies the same.

1522. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1522, and therefore denies the same.

1523. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1523, and therefore denies the same.

1524. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1524, and therefore denies the same.

1525. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1525, and therefore denies the same.

1526. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1526, and therefore denies the same.

1527. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1527, and therefore denies the same.

1528. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1528, and therefore denies the same.

1529. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1529, and therefore denies the same.

1530. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1530, and therefore denies the same.

1531. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1531, and therefore denies the same.

1532. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1532, and therefore denies the same.

1533. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1533, and therefore denies the same.

1534. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1534, and therefore denies the same.

1535. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1535, and therefore denies the same.

1536. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1536, and therefore denies the same.

1537. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1537, and therefore denies the same.

1538. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1538, and therefore denies the same.

1539. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1539, and therefore denies the same.

1540. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1540, and therefore denies the same.

1541. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1541, and therefore denies the same.

1542. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1542, and therefore denies the same.

1543. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1543, and therefore denies the same.

1544. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1544, and therefore denies the same.

1545. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1545, and therefore denies the same.

1546. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1546, and therefore denies the same.

1547. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1547, and therefore denies the same.

1548. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1548, and therefore denies the same.

1549. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1549, and therefore denies the same.

1550. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1550, and therefore denies the same.

1551. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1551, and therefore denies the same.

1552. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1552, and therefore denies the same.

1553. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1553, and therefore denies the same.

1554. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1554, and therefore denies the same.

1555. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1555, and therefore denies the same.

1556. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1556, and therefore denies the same.

1557. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1557, and therefore denies the same.

1558. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1558, and therefore denies the same.



1559. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1559, and therefore denies the same.

1560. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1560, and therefore denies the same.

1561. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1561, and therefore denies the same.

1562. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1562, and therefore denies the same.

1563. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1563, and therefore denies the same.

1564. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1564, and therefore denies the same.

1565. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1565, and therefore denies the same.

1566. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1566, and therefore denies the same.

1567. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1567, and therefore denies the same.

1568. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1568, and therefore denies the same.

1569. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1569, and therefore denies the same.

1570. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1570, and therefore denies the same.

1571. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1571, and therefore denies the same.

1572. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1572, and therefore denies the same.

1573. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1573, and therefore denies the same.

1574. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1574, and therefore denies the same.

1575. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1575, and therefore denies the same.

1576. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1576, and therefore denies the same.

1577. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1577, and therefore denies the same.

1578. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1578, and therefore denies the same.

1579. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1579, and therefore denies the same.

1580. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1580, and therefore denies the same.

1581. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1581, and therefore denies the same.

1582. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1582, and therefore denies the same.

1583. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1583, and therefore denies the same.

1584. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1584, and therefore denies the same.

1585. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1585, and therefore denies the same.

1586. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1586, and therefore denies the same.

1587. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1587, and therefore denies the same.

1588. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1588, and therefore denies the same.

1589. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1589, and therefore denies the same.

1590. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1590, and therefore denies the same.

1591. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1591, and therefore denies the same.

1592. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1592, and therefore denies the same.

1593. Apple denies the allegations in Paragraph 1593.

1594. Apple denies the allegations in Paragraph 1594.

1595. Apple denies the allegations in Paragraph 1595.

## **SEVENTH COUNT**

### **(Infringement of the '143 patent)**

1596. Apple incorporates by reference its responses to Paragraphs 1-1595 of this Answer as if fully set forth herein.

1597. Apple denies the allegations in Paragraph 1597.

1598. Apple denies the allegations in Paragraph 1598.

1599. Apple denies the allegations in Paragraph 1599.

1600. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1600.

1601. Apple denies the allegations in Paragraph 1601.

1602. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1602, and therefore denies the same.

1603. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1603, and therefore denies the same.

1604. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1604, and therefore denies the same.

1605. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1605, and therefore denies the same.

1606. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1606, and therefore denies the same.

1607. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1607, and therefore denies the same.

1608. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1608, and therefore denies the same.

1609. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1609, and therefore denies the same.

1610. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1610, and therefore denies the same.

1611. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1611, and therefore denies the same.

1612. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1612, and therefore denies the same.

1613. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1613, and therefore denies the same.

1614. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1614, and therefore denies the same.

1615. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1615, and therefore denies the same.

1616. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1616, and therefore denies the same.

1617. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1617, and therefore denies the same.

1618. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1618, and therefore denies the same.

1619. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1619, and therefore denies the same.

1620. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1620, and therefore denies the same.

1621. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1621, and therefore denies the same.

1622. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1622, and therefore denies the same.

1623. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1623, and therefore denies the same.

1624. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1624, and therefore denies the same.

1625. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1625, and therefore denies the same.

1626. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1626, and therefore denies the same.

1627. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1627, and therefore denies the same.

1628. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1628, and therefore denies the same.

1629. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1629, and therefore denies the same.

1630. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1630, and therefore denies the same.

1631. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1631, and therefore denies the same.

1632. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1632, and therefore denies the same.

1633. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1633, and therefore denies the same.

1634. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1634, and therefore denies the same.

1635. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1635, and therefore denies the same.

1636. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1636, and therefore denies the same.

1637. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1637, and therefore denies the same.

1638. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1638, and therefore denies the same.

1639. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1639, and therefore denies the same.

1640. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1640, and therefore denies the same.

1641. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1641, and therefore denies the same.

1642. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1642, and therefore denies the same.

1643. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1643, and therefore denies the same.

1644. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1644, and therefore denies the same.

1645. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1645, and therefore denies the same.

1646. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1646, and therefore denies the same.

1647. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1647, and therefore denies the same.

1648. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1648, and therefore denies the same.

1649. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1649, and therefore denies the same.



1650. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1650, and therefore denies the same.

1651. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1651, and therefore denies the same.

1652. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1652, and therefore denies the same.

1653. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1653, and therefore denies the same.

1654. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1654, and therefore denies the same.

1655. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1655, and therefore denies the same.

1656. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1656, and therefore denies the same.

1657. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1657, and therefore denies the same.

1658. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1658, and therefore denies the same.

1659. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1659, and therefore denies the same.

1660. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1660, and therefore denies the same.

1661. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1661, and therefore denies the same.

1662. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1662, and therefore denies the same.

1663. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1663, and therefore denies the same.

1664. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1664, and therefore denies the same.

1665. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1665, and therefore denies the same.

1666. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1666, and therefore denies the same.

1667. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1667, and therefore denies the same.

1668. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1668, and therefore denies the same.

1669. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1669, and therefore denies the same.

1670. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1670, and therefore denies the same.

1671. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1671, and therefore denies the same.

1672. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1672, and therefore denies the same.

1673. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1673, and therefore denies the same.

1674. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1674, and therefore denies the same.

1675. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1675, and therefore denies the same.

1676. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1676, and therefore denies the same.

1677. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1677, and therefore denies the same.

1678. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1678, and therefore denies the same.

1679. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1679, and therefore denies the same.

1680. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1680, and therefore denies the same.

1681. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1681, and therefore denies the same.

1682. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1682, and therefore denies the same.

1683. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1683, and therefore denies the same.

1684. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1684, and therefore denies the same.

1685. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1685, and therefore denies the same.

1686. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1686, and therefore denies the same.

1687. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1687, and therefore denies the same.

1688. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1688, and therefore denies the same.

1689. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1689, and therefore denies the same.

1690. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1690, and therefore denies the same.

1691. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1691, and therefore denies the same.

1692. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1692, and therefore denies the same.

1693. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1693, and therefore denies the same.

1694. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1694, and therefore denies the same.

1695. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1695, and therefore denies the same.

1696. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1696, and therefore denies the same.

1697. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1697, and therefore denies the same.

1698. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1698, and therefore denies the same.

1699. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1699, and therefore denies the same.

1700. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1700, and therefore denies the same.

1701. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1701, and therefore denies the same.

1702. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1702, and therefore denies the same.

1703. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1703, and therefore denies the same.

1704. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1704, and therefore denies the same.

1705. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1705, and therefore denies the same.

1706. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1706, and therefore denies the same.

1707. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1707, and therefore denies the same.

1708. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1708, and therefore denies the same.

1709. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1709, and therefore denies the same.

1710. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1710, and therefore denies the same.

1711. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1711, and therefore denies the same.

1712. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1712, and therefore denies the same.

1713. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1713, and therefore denies the same.

1714. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1714, and therefore denies the same.

1715. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1715, and therefore denies the same.

1716. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1716, and therefore denies the same.

1717. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1717, and therefore denies the same.

1718. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1718, and therefore denies the same.

1719. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1719, and therefore denies the same.

1720. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1720, and therefore denies the same.

1721. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1721, and therefore denies the same.

1722. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1722, and therefore denies the same.

1723. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1723, and therefore denies the same.

1724. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1724, and therefore denies the same.

1725. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1725, and therefore denies the same.

1726. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1726, and therefore denies the same.

1727. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1727, and therefore denies the same.

1728. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1728, and therefore denies the same.

1729. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1729, and therefore denies the same.

1730. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1730, and therefore denies the same.

1731. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1731, and therefore denies the same.

1732. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1732, and therefore denies the same.

1733. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1733, and therefore denies the same.

1734. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1734, and therefore denies the same.

1735. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1735, and therefore denies the same.

1736. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1736, and therefore denies the same.

1737. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1737, and therefore denies the same.



1738. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1738, and therefore denies the same.

1739. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1739, and therefore denies the same.

1740. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1740, and therefore denies the same.

1741. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1741, and therefore denies the same.

1742. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1742, and therefore denies the same.

1743. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1743, and therefore denies the same.

1744. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1744, and therefore denies the same.

1745. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1745, and therefore denies the same.

1746. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1746, and therefore denies the same.

1747. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1747, and therefore denies the same.

1748. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1748, and therefore denies the same.

1749. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1749, and therefore denies the same.

1750. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1750, and therefore denies the same.

1751. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1751, and therefore denies the same.

1752. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1752, and therefore denies the same.

1753. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1753, and therefore denies the same.

1754. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1754, and therefore denies the same.

1755. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1755, and therefore denies the same.

1756. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1756, and therefore denies the same.

1757. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1757, and therefore denies the same.

1758. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1758, and therefore denies the same.

1759. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1759, and therefore denies the same.

1760. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1760, and therefore denies the same.

1761. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1761, and therefore denies the same.

1762. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1762, and therefore denies the same.

1763. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1763, and therefore denies the same.

1764. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1764, and therefore denies the same.

1765. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1765, and therefore denies the same.

1766. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1766, and therefore denies the same.

1767. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1767, and therefore denies the same.

1768. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1768, and therefore denies the same.

1769. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1769, and therefore denies the same.

1770. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1770, and therefore denies the same.

1771. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1771, and therefore denies the same.

1772. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1772, and therefore denies the same.

1773. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1773, and therefore denies the same.

1774. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1774, and therefore denies the same.

1775. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1775, and therefore denies the same.

1776. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1776, and therefore denies the same.

1777. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1777, and therefore denies the same.

1778. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1778, and therefore denies the same.

1779. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1779, and therefore denies the same.

1780. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1780, and therefore denies the same.

1781. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1781, and therefore denies the same.

1782. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1782, and therefore denies the same.

1783. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1783, and therefore denies the same.

1784. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1784, and therefore denies the same.

1785. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1785, and therefore denies the same.

1786. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1786, and therefore denies the same.

1787. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1787, and therefore denies the same.

1788. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1788, and therefore denies the same.

1789. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1789, and therefore denies the same.

1790. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1790, and therefore denies the same.

1791. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1791, and therefore denies the same.

1792. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1792, and therefore denies the same.

1793. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1793, and therefore denies the same.

1794. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1794, and therefore denies the same.

1795. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1795, and therefore denies the same.

1796. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1796, and therefore denies the same.

1797. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1797, and therefore denies the same.

1798. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1798, and therefore denies the same.

1799. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1799, and therefore denies the same.

1800. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1800, and therefore denies the same.

1801. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1801, and therefore denies the same.

1802. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1802, and therefore denies the same.

1803. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1803, and therefore denies the same.

1804. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1804, and therefore denies the same.

1805. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1805, and therefore denies the same.

1806. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1806, and therefore denies the same.

1807. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1807, and therefore denies the same.

1808. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1808, and therefore denies the same.

1809. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1809, and therefore denies the same.

1810. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1810, and therefore denies the same.

1811. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1811, and therefore denies the same.

1812. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1812, and therefore denies the same.

1813. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1813, and therefore denies the same.

1814. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1814, and therefore denies the same.

1815. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1815, and therefore denies the same.

1816. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1816, and therefore denies the same.

1817. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1817, and therefore denies the same.

1818. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1818, and therefore denies the same.

1819. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1819, and therefore denies the same.

1820. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1820, and therefore denies the same.

1821. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1821, and therefore denies the same.

1822. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1822, and therefore denies the same.

1823. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1823, and therefore denies the same.

1824. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1824, and therefore denies the same.

1825. Apple denies the allegations in Paragraph 1825.

1826. Apple denies the allegations in Paragraph 1826.

1827. Apple denies the allegations in Paragraph 1827.



## **EIGHTH COUNT**

### **(Infringement of the '850 patent)**

1828. Apple incorporates by reference its responses to Paragraphs 1-1827 of this Answer as if fully set forth herein.

1829. Apple denies the allegations in Paragraph 1829.

1830. Apple denies the allegations in Paragraph 1830.

1831. Apple denies the allegations in Paragraph 1831.

1832. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1832.

1833. Apple denies the allegations in Paragraph 1833.

1834. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1834, and therefore denies the same.

1835. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1835, and therefore denies the same.

1836. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1836, and therefore denies the same.

1837. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1837, and therefore denies the same.

1838. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1838, and therefore denies the same.

1839. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1839, and therefore denies the same.

1840. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1840, and therefore denies the same.

1841. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1841, and therefore denies the same.

1842. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1842, and therefore denies the same.

1843. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1843, and therefore denies the same.

1844. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1844, and therefore denies the same.

1845. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1845, and therefore denies the same.

1846. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1846, and therefore denies the same.

1847. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1847, and therefore denies the same.

1848. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1848, and therefore denies the same.

1849. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1849, and therefore denies the same.

1850. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1850, and therefore denies the same.

1851. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1851, and therefore denies the same.

1852. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1852, and therefore denies the same.

1853. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1853, and therefore denies the same.

1854. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1854, and therefore denies the same.

1855. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1855, and therefore denies the same.

1856. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1856, and therefore denies the same.

1857. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1857, and therefore denies the same.

1858. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1858, and therefore denies the same.

1859. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1859, and therefore denies the same.

1860. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1860, and therefore denies the same.

1861. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1861, and therefore denies the same.

1862. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1862, and therefore denies the same.

1863. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1863, and therefore denies the same.

1864. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1864, and therefore denies the same.

1865. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1865, and therefore denies the same.

1866. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1866, and therefore denies the same.

1867. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1867, and therefore denies the same.

1868. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1868, and therefore denies the same.

1869. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1869, and therefore denies the same.

1870. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1870, and therefore denies the same.

1871. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1871, and therefore denies the same.

1872. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1872, and therefore denies the same.

1873. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1873, and therefore denies the same.

1874. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1874, and therefore denies the same.

1875. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1875, and therefore denies the same.

1876. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1876, and therefore denies the same.

1877. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1877, and therefore denies the same.

1878. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1878, and therefore denies the same.

1879. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1879, and therefore denies the same.

1880. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1880, and therefore denies the same.

1881. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1881, and therefore denies the same.

1882. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1882, and therefore denies the same.

1883. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1883, and therefore denies the same.

1884. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1884, and therefore denies the same.

1885. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1885, and therefore denies the same.

1886. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1886, and therefore denies the same.

1887. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1887, and therefore denies the same.

1888. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1888, and therefore denies the same.

1889. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1889, and therefore denies the same.

1890. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1890, and therefore denies the same.

1891. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1891, and therefore denies the same.

1892. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1892, and therefore denies the same.

1893. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1893, and therefore denies the same.

1894. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1894, and therefore denies the same.

1895. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1895, and therefore denies the same.

1896. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1896, and therefore denies the same.

1897. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1897, and therefore denies the same.

1898. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1898, and therefore denies the same.

1899. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1899, and therefore denies the same.

1900. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1900, and therefore denies the same.

1901. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1901, and therefore denies the same.

1902. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1902, and therefore denies the same.

1903. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1903, and therefore denies the same.

1904. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1904, and therefore denies the same.

1905. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1905, and therefore denies the same.

1906. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1906, and therefore denies the same.

1907. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1907, and therefore denies the same.

1908. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1908, and therefore denies the same.

1909. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1909, and therefore denies the same.

1910. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1910, and therefore denies the same.

1911. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1911, and therefore denies the same.

1912. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1912, and therefore denies the same.

1913. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1913, and therefore denies the same.

1914. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1914, and therefore denies the same.

1915. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1915, and therefore denies the same.

1916. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1916, and therefore denies the same.

1917. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1917, and therefore denies the same.



1918. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1918, and therefore denies the same.

1919. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1919, and therefore denies the same.

1920. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1920, and therefore denies the same.

1921. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1921, and therefore denies the same.

1922. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1922, and therefore denies the same.

1923. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1923, and therefore denies the same.

1924. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1924, and therefore denies the same.

1925. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1925, and therefore denies the same.

1926. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1926, and therefore denies the same.

1927. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1927, and therefore denies the same.

1928. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1928, and therefore denies the same.

1929. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1929, and therefore denies the same.

1930. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1930, and therefore denies the same.

1931. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1931, and therefore denies the same.

1932. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1932, and therefore denies the same.

1933. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1933, and therefore denies the same.

1934. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1934, and therefore denies the same.

1935. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1935, and therefore denies the same.

1936. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1936, and therefore denies the same.

1937. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1937, and therefore denies the same.

1938. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1938, and therefore denies the same.

1939. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1939, and therefore denies the same.

1940. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1940, and therefore denies the same.

1941. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1941, and therefore denies the same.

1942. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1942, and therefore denies the same.

1943. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1943, and therefore denies the same.

1944. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1944, and therefore denies the same.

1945. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1945, and therefore denies the same.

1946. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1946, and therefore denies the same.

1947. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1947, and therefore denies the same.

1948. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1948, and therefore denies the same.

1949. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1949, and therefore denies the same.

1950. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1950, and therefore denies the same.

1951. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1951, and therefore denies the same.

1952. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1952, and therefore denies the same.

1953. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1953, and therefore denies the same.

1954. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1954, and therefore denies the same.

1955. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1955, and therefore denies the same.

1956. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1956, and therefore denies the same.

1957. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1957, and therefore denies the same.

1958. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1958, and therefore denies the same.

1959. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1959, and therefore denies the same.

1960. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1960, and therefore denies the same.

1961. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1961, and therefore denies the same.

1962. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1962, and therefore denies the same.

1963. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1963, and therefore denies the same.

1964. Apple denies the allegations in Paragraph 1964.

1965. Apple denies the allegations in Paragraph 1965.

1966. Apple denies the allegations in Paragraph 1966.

## **NINTH COUNT**

### **(Infringement of the '679 patent)**

1967. Apple incorporates by reference its responses to Paragraphs 1-1966 of this Answer as if fully set forth herein.

1968. Apple denies the allegations in Paragraph 1968.

1969. Apple denies the allegations in Paragraph 1969.

1970. Apple denies the allegations in Paragraph 1970.

1971. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 1971.

1972. Apple denies the allegations in Paragraph 1972.

1973. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1973, and therefore denies the same.

1974. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1974, and therefore denies the same.

1975. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1975, and therefore denies the same.

1976. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1976, and therefore denies the same.

1977. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1977, and therefore denies the same.

1978. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1978, and therefore denies the same.

1979. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1979, and therefore denies the same.

1980. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1980, and therefore denies the same.

1981. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1981, and therefore denies the same.

1982. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1982, and therefore denies the same.

1983. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1983, and therefore denies the same.

1984. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1984, and therefore denies the same.

1985. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1985, and therefore denies the same.

1986. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1986, and therefore denies the same.

1987. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1987, and therefore denies the same.

1988. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1988, and therefore denies the same.

1989. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1989, and therefore denies the same.

1990. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1990, and therefore denies the same.

1991. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1991, and therefore denies the same.

1992. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1992, and therefore denies the same.

1993. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1993, and therefore denies the same.

1994. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1994, and therefore denies the same.

1995. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1995, and therefore denies the same.

1996. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1996, and therefore denies the same.

1997. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1997, and therefore denies the same.

1998. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1998, and therefore denies the same.

1999. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1999, and therefore denies the same.

2000. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2000, and therefore denies the same.

2001. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2001, and therefore denies the same.

2002. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2002, and therefore denies the same.

2003. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2003, and therefore denies the same.

2004. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2004, and therefore denies the same.

2005. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2005, and therefore denies the same.

2006. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2006, and therefore denies the same.

2007. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2007, and therefore denies the same.

2008. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2008, and therefore denies the same.



2009. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2009, and therefore denies the same.

2010. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2010, and therefore denies the same.

2011. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2011, and therefore denies the same.

2012. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2012, and therefore denies the same.

2013. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2013, and therefore denies the same.

2014. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2014, and therefore denies the same.

2015. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2015, and therefore denies the same.

2016. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2016, and therefore denies the same.

2017. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2017, and therefore denies the same.

2018. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2018, and therefore denies the same.

2019. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2019, and therefore denies the same.

2020. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2020, and therefore denies the same.

2021. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2021, and therefore denies the same.

2022. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2022, and therefore denies the same.

2023. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2023, and therefore denies the same.

2024. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2024, and therefore denies the same.

2025. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2025, and therefore denies the same.

2026. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2026, and therefore denies the same.

2027. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2027, and therefore denies the same.

2028. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2028, and therefore denies the same.

2029. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2029, and therefore denies the same.

2030. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2030, and therefore denies the same.

2031. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2031, and therefore denies the same.

2032. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2032, and therefore denies the same.

2033. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2033, and therefore denies the same.

2034. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2034, and therefore denies the same.

2035. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2035, and therefore denies the same.

2036. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2036, and therefore denies the same.

2037. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2037, and therefore denies the same.

2038. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2038, and therefore denies the same.

2039. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2039, and therefore denies the same.

2040. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2040, and therefore denies the same.

2041. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2041, and therefore denies the same.

2042. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2042, and therefore denies the same.

2043. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2043, and therefore denies the same.

2044. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2044, and therefore denies the same.

2045. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2045, and therefore denies the same.

2046. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2046, and therefore denies the same.

2047. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2047, and therefore denies the same.

2048. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2048, and therefore denies the same.

2049. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2049, and therefore denies the same.

2050. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2050, and therefore denies the same.

2051. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2051, and therefore denies the same.

2052. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2052, and therefore denies the same.

2053. Apple denies the allegations in Paragraph 2053.

2054. Apple denies the allegations in Paragraph 2054.

2055. Apple denies the allegations in Paragraph 2055.

#### **TENTH COUNT**

##### **(Infringement of the '045 patent)**

2056. Apple incorporates by reference its responses to Paragraphs 1-2055 of this Answer as if fully set forth herein.

2057. Apple denies the allegations in Paragraph 2057.

2058. Apple denies the allegations in Paragraph 2058.

2059. Apple denies the allegations in Paragraph 2059.

2060. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 2060.

2061. Apple denies the allegations in Paragraph 2061.

2062. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2062, and therefore denies the same.

2063. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2063, and therefore denies the same.

2064. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2064, and therefore denies the same.

2065. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2065, and therefore denies the same.

2066. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2066, and therefore denies the same.

2067. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2067, and therefore denies the same.

2068. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2068, and therefore denies the same.

2069. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2069, and therefore denies the same.

2070. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2070, and therefore denies the same.

2071. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2071, and therefore denies the same.

2072. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2072, and therefore denies the same.

2073. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2073, and therefore denies the same.

2074. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2074, and therefore denies the same.

2075. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2075, and therefore denies the same.

2076. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2076, and therefore denies the same.

2077. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2077, and therefore denies the same.

2078. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2078, and therefore denies the same.

2079. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2079, and therefore denies the same.

2080. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2080, and therefore denies the same.

2081. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2081, and therefore denies the same.

2082. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2082, and therefore denies the same.

2083. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2083, and therefore denies the same.

2084. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2084, and therefore denies the same.

2085. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2085, and therefore denies the same.

2086. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2086, and therefore denies the same.

2087. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2087, and therefore denies the same.

2088. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2088, and therefore denies the same.

2089. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2089, and therefore denies the same.

2090. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2090, and therefore denies the same.

2091. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2091, and therefore denies the same.

2092. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2092, and therefore denies the same.

2093. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2093, and therefore denies the same.

2094. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2094, and therefore denies the same.

2095. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2095, and therefore denies the same.

2096. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2096, and therefore denies the same.

2097. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2097, and therefore denies the same.

2098. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2098, and therefore denies the same.

2099. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2099, and therefore denies the same.

2100. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2100, and therefore denies the same.



2101. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2101, and therefore denies the same.

2102. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2102, and therefore denies the same.

2103. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2103, and therefore denies the same.

2104. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2104, and therefore denies the same.

2105. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2105, and therefore denies the same.

2106. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2106, and therefore denies the same.

2107. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2107, and therefore denies the same.

2108. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2108, and therefore denies the same.

2109. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2109, and therefore denies the same.

2110. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2110, and therefore denies the same.

2111. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2111, and therefore denies the same.

2112. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2112, and therefore denies the same.

2113. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2113, and therefore denies the same.

2114. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2114, and therefore denies the same.

2115. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2115, and therefore denies the same.

2116. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2116, and therefore denies the same.

2117. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2117, and therefore denies the same.

2118. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2118, and therefore denies the same.

2119. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2119, and therefore denies the same.

2120. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2120, and therefore denies the same.

2121. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2121, and therefore denies the same.

2122. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2122, and therefore denies the same.

2123. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2123, and therefore denies the same.

2124. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2124, and therefore denies the same.

2125. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2125, and therefore denies the same.

2126. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2126, and therefore denies the same.

2127. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2127, and therefore denies the same.

2128. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2128, and therefore denies the same.

2129. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2129, and therefore denies the same.

2130. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2130, and therefore denies the same.

2131. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2131, and therefore denies the same.

2132. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2132, and therefore denies the same.

2133. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2133, and therefore denies the same.

2134. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2134, and therefore denies the same.

2135. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2135, and therefore denies the same.

2136. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2136, and therefore denies the same.

2137. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2137, and therefore denies the same.

2138. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2138, and therefore denies the same.

2139. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2139, and therefore denies the same.

2140. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2140, and therefore denies the same.

2141. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2141, and therefore denies the same.

2142. Apple denies the allegations in Paragraph 2142.

2143. Apple denies the allegations in Paragraph 2143.

2144. Apple denies the allegations in Paragraph 2144.

#### **ELEVENTH COUNT**

##### **(Infringement of the '860 patent)**

2145. Apple incorporates by reference its responses to Paragraphs 1-2144 of this Answer as if fully set forth herein.

2146. Apple denies the allegations in Paragraph 2146.

2147. Apple denies the allegations in Paragraph 2147.

2148. Apple denies the allegations in Paragraph 2148.

2149. Apple admits that Apple and Nokia signed a patent licensing agreement in June

2011. Apple denies all remaining allegations in Paragraph 2149.

2150. Apple denies the allegations in Paragraph 2150.

2151. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2151, and therefore denies the same.

2152. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2152, and therefore denies the same.

2153. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2153, and therefore denies the same.

2154. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2154, and therefore denies the same.

2155. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2155, and therefore denies the same.

2156. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2156, and therefore denies the same.

2157. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2157, and therefore denies the same.

2158. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2158, and therefore denies the same.

2159. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2159, and therefore denies the same.

2160. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2160, and therefore denies the same.

2161. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2161, and therefore denies the same.

2162. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2162, and therefore denies the same.

2163. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2163, and therefore denies the same.

2164. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2164, and therefore denies the same.

2165. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2165, and therefore denies the same.

2166. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2166, and therefore denies the same.

2167. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2167, and therefore denies the same.

2168. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2168, and therefore denies the same.

2169. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2169, and therefore denies the same.

2170. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2170, and therefore denies the same.

2171. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2171, and therefore denies the same.

2172. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2172, and therefore denies the same.

2173. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2173, and therefore denies the same.

2174. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2174, and therefore denies the same.

2175. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2175, and therefore denies the same.

2176. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2176, and therefore denies the same.

2177. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2177, and therefore denies the same.

2178. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2178, and therefore denies the same.

2179. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2179, and therefore denies the same.

2180. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2180, and therefore denies the same.

2181. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2181, and therefore denies the same.

2182. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2182, and therefore denies the same.

2183. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2183, and therefore denies the same.

2184. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2184, and therefore denies the same.

2185. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2185, and therefore denies the same.

2186. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2186, and therefore denies the same.

2187. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2187, and therefore denies the same.

2188. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2188, and therefore denies the same.

2189. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2189, and therefore denies the same.

2190. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2190, and therefore denies the same.

2191. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2191, and therefore denies the same.

2192. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2192, and therefore denies the same.



2193. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2193, and therefore denies the same.

2194. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2194, and therefore denies the same.

2195. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2195, and therefore denies the same.

2196. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2196, and therefore denies the same.

2197. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2197, and therefore denies the same.

2198. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2198, and therefore denies the same.

2199. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2199, and therefore denies the same.

2200. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2200, and therefore denies the same.

2201. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2201, and therefore denies the same.

2202. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2202, and therefore denies the same.

2203. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2203, and therefore denies the same.

2204. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2204, and therefore denies the same.

2205. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2205, and therefore denies the same.

2206. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2206, and therefore denies the same.

2207. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2207, and therefore denies the same.

2208. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2208, and therefore denies the same.

2209. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2209, and therefore denies the same.

2210. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2210, and therefore denies the same.

2211. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2211, and therefore denies the same.

2212. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2212, and therefore denies the same.

2213. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2213, and therefore denies the same.

2214. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2214, and therefore denies the same.

2215. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2215, and therefore denies the same.

2216. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2216, and therefore denies the same.

2217. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2217, and therefore denies the same.

2218. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2218, and therefore denies the same.

2219. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2219, and therefore denies the same.

2220. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2220, and therefore denies the same.

2221. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2221, and therefore denies the same.

2222. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2222, and therefore denies the same.

2223. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2223, and therefore denies the same.

2224. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2224, and therefore denies the same.

2225. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2225, and therefore denies the same.

2226. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2226, and therefore denies the same.

2227. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2227, and therefore denies the same.

2228. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2228, and therefore denies the same.

2229. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2229, and therefore denies the same.

2230. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2230, and therefore denies the same.

2231. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2231, and therefore denies the same.

2232. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2232, and therefore denies the same.

2233. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2233, and therefore denies the same.

2234. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2234, and therefore denies the same.

2235. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2235, and therefore denies the same.

2236. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2236, and therefore denies the same.

2237. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2237, and therefore denies the same.

2238. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2238, and therefore denies the same.

2239. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2239, and therefore denies the same.

2240. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2240, and therefore denies the same.

2241. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2241, and therefore denies the same.

2242. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2242, and therefore denies the same.

2243. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2243, and therefore denies the same.

2244. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2244, and therefore denies the same.

2245. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2245, and therefore denies the same.

2246. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2246, and therefore denies the same.

2247. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2247, and therefore denies the same.

2248. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2248, and therefore denies the same.

2249. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2249, and therefore denies the same.

2250. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2250, and therefore denies the same.

2251. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2251, and therefore denies the same.

2252. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2252, and therefore denies the same.

2253. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2253, and therefore denies the same.

2254. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2254, and therefore denies the same.

2255. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2255, and therefore denies the same.

2256. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2256, and therefore denies the same.

2257. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2257, and therefore denies the same.

2258. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2258, and therefore denies the same.

2259. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2259, and therefore denies the same.

2260. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2260, and therefore denies the same.

2261. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2261, and therefore denies the same.

2262. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2262, and therefore denies the same.

2263. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2263, and therefore denies the same.

2264. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2264, and therefore denies the same.

2265. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2265, and therefore denies the same.

2266. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2266, and therefore denies the same.

2267. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2267, and therefore denies the same.

2268. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2268, and therefore denies the same.

2269. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2269, and therefore denies the same.

2270. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2270, and therefore denies the same.

2271. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2271, and therefore denies the same.

2272. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2272, and therefore denies the same.

2273. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2273, and therefore denies the same.

2274. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2274, and therefore denies the same.

2275. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2275, and therefore denies the same.

2276. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2276, and therefore denies the same.

2277. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2277, and therefore denies the same.

2278. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2278, and therefore denies the same.

2279. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2279, and therefore denies the same.

2280. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2280, and therefore denies the same.



2281. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2281, and therefore denies the same.

2282. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2282, and therefore denies the same.

2283. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2283, and therefore denies the same.

2284. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2284, and therefore denies the same.

2285. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2285, and therefore denies the same.

2286. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2286, and therefore denies the same.

2287. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2287, and therefore denies the same.

2288. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2288, and therefore denies the same.

2289. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2289, and therefore denies the same.

2290. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2290, and therefore denies the same.

2291. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2291, and therefore denies the same.

2292. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2292, and therefore denies the same.

2293. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2293, and therefore denies the same.

2294. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2294, and therefore denies the same.

2295. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2295, and therefore denies the same.

2296. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2296, and therefore denies the same.

2297. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2297, and therefore denies the same.

2298. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2298, and therefore denies the same.

2299. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2299, and therefore denies the same.

2300. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2300, and therefore denies the same.

2301. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2301, and therefore denies the same.

2302. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2302, and therefore denies the same.

2303. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2303, and therefore denies the same.

2304. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2304, and therefore denies the same.

2305. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2305, and therefore denies the same.

2306. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2306, and therefore denies the same.

2307. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2307, and therefore denies the same.

2308. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2308, and therefore denies the same.

2309. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2309, and therefore denies the same.

2310. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2310, and therefore denies the same.

2311. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2311, and therefore denies the same.

2312. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2312, and therefore denies the same.

2313. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2313, and therefore denies the same.

2314. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2314, and therefore denies the same.

2315. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2315, and therefore denies the same.

2316. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2316, and therefore denies the same.

2317. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2317, and therefore denies the same.

2318. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2318, and therefore denies the same.

2319. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2319, and therefore denies the same.

2320. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2320, and therefore denies the same.

2321. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2321, and therefore denies the same.

2322. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2322, and therefore denies the same.

2323. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2323, and therefore denies the same.

2324. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2324, and therefore denies the same.

2325. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2325, and therefore denies the same.

2326. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2326, and therefore denies the same.

2327. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2327, and therefore denies the same.

2328. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2328, and therefore denies the same.

2329. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2329, and therefore denies the same.

2330. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2330, and therefore denies the same.

2331. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2331, and therefore denies the same.

2332. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2332, and therefore denies the same.

2333. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2333, and therefore denies the same.

2334. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2334, and therefore denies the same.

2335. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2335, and therefore denies the same.

2336. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2336, and therefore denies the same.

2337. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2337, and therefore denies the same.

2338. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2338, and therefore denies the same.

2339. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2339, and therefore denies the same.

2340. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2340, and therefore denies the same.

2341. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2341, and therefore denies the same.

2342. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2342, and therefore denies the same.

2343. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2343, and therefore denies the same.

2344. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2344, and therefore denies the same.

2345. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2345, and therefore denies the same.

2346. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2346, and therefore denies the same.

2347. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2347, and therefore denies the same.

2348. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2348, and therefore denies the same.

2349. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2349, and therefore denies the same.

2350. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2350, and therefore denies the same.

2351. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2351, and therefore denies the same.

2352. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2352, and therefore denies the same.

2353. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2353, and therefore denies the same.

2354. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2354, and therefore denies the same.

2355. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2355, and therefore denies the same.

2356. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2356, and therefore denies the same.

2357. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2357, and therefore denies the same.

2358. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2358, and therefore denies the same.

2359. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2359, and therefore denies the same.

2360. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2360, and therefore denies the same.

2361. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2361, and therefore denies the same.

2362. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2362, and therefore denies the same.

2363. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2363, and therefore denies the same.

2364. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2364, and therefore denies the same.

2365. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2365, and therefore denies the same.

2366. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2366, and therefore denies the same.

2367. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2367, and therefore denies the same.

2368. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2368, and therefore denies the same.



2369. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2369, and therefore denies the same.

2370. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2370, and therefore denies the same.

2371. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2371, and therefore denies the same.

2372. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2372, and therefore denies the same.

2373. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2373, and therefore denies the same.

2374. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2374, and therefore denies the same.

2375. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2375, and therefore denies the same.

2376. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2376, and therefore denies the same.

2377. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2377, and therefore denies the same.

2378. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2378, and therefore denies the same.

2379. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2379, and therefore denies the same.

2380. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2380, and therefore denies the same.

2381. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2381, and therefore denies the same.

2382. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2382, and therefore denies the same.

2383. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2383, and therefore denies the same.

2384. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2384, and therefore denies the same.

2385. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2385, and therefore denies the same.

2386. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2386, and therefore denies the same.

2387. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2387, and therefore denies the same.

2388. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2388, and therefore denies the same.

2389. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2389, and therefore denies the same.

2390. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2390, and therefore denies the same.

2391. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2391, and therefore denies the same.

2392. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2392, and therefore denies the same.

2393. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2393, and therefore denies the same.

2394. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2394, and therefore denies the same.

2395. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2395, and therefore denies the same.

2396. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2396, and therefore denies the same.

2397. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2397, and therefore denies the same.

2398. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2398, and therefore denies the same.

2399. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2399, and therefore denies the same.

2400. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2400, and therefore denies the same.

2401. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2401, and therefore denies the same.

2402. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2402, and therefore denies the same.

2403. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2403, and therefore denies the same.

2404. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2404, and therefore denies the same.

2405. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2405, and therefore denies the same.

2406. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2406, and therefore denies the same.

2407. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2407, and therefore denies the same.

2408. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2408, and therefore denies the same.

2409. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2409, and therefore denies the same.

2410. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2410, and therefore denies the same.

2411. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2411, and therefore denies the same.

2412. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2412, and therefore denies the same.

2413. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2413, and therefore denies the same.

2414. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2414, and therefore denies the same.

2415. Apple denies the allegations in Paragraph 2415.

2416. Apple denies the allegations in Paragraph 2416.

2417. Apple denies the allegations in Paragraph 2417.

## **TWELFTH COUNT**

### **(Infringement of the '022 patent)**

2418. Apple incorporates by reference its responses to Paragraphs 1-2417 of this Answer as if fully set forth herein.

2419. Apple denies the allegations in Paragraph 2419.

2420. Apple denies the allegations in Paragraph 2420.

2421. Apple denies the allegations in Paragraph 2421.

2422. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 2422.

2423. Apple denies the allegations in Paragraph 2423.

2424. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2424, and therefore denies the same.

2425. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2425, and therefore denies the same.

2426. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2426, and therefore denies the same.

2427. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2427, and therefore denies the same.

2428. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2428, and therefore denies the same.

2429. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2429, and therefore denies the same.

2430. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2430, and therefore denies the same.

2431. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2431, and therefore denies the same.

2432. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2432, and therefore denies the same.

2433. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2433, and therefore denies the same.

2434. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2434, and therefore denies the same.

2435. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2435, and therefore denies the same.

2436. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2436, and therefore denies the same.

2437. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2437, and therefore denies the same.

2438. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2438, and therefore denies the same.

2439. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2439, and therefore denies the same.

2440. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2440, and therefore denies the same.

2441. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2441, and therefore denies the same.

2442. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2442, and therefore denies the same.

2443. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2443, and therefore denies the same.

2444. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2444, and therefore denies the same.

2445. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2445, and therefore denies the same.

2446. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2446, and therefore denies the same.

2447. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2447, and therefore denies the same.

2448. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2448, and therefore denies the same.

2449. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2449, and therefore denies the same.

2450. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2450, and therefore denies the same.

2451. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2451, and therefore denies the same.

2452. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2452, and therefore denies the same.

2453. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2453, and therefore denies the same.

2454. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2454, and therefore denies the same.

2455. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2455, and therefore denies the same.

2456. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2456, and therefore denies the same.

2457. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2457, and therefore denies the same.

2458. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2458, and therefore denies the same.

2459. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2459, and therefore denies the same.



2460. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2460, and therefore denies the same.

2461. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2461, and therefore denies the same.

2462. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2462, and therefore denies the same.

2463. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2463, and therefore denies the same.

2464. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2464, and therefore denies the same.

2465. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2465, and therefore denies the same.

2466. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2466 , and therefore denies the same.

2467. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2467, and therefore denies the same.

2468. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2468, and therefore denies the same.

2469. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2469, and therefore denies the same.

2470. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2470, and therefore denies the same.

2471. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2471, and therefore denies the same.

2472. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2472, and therefore denies the same.

2473. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2473, and therefore denies the same.

2474. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2474, and therefore denies the same.

2475. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2475, and therefore denies the same.

2476. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2476, and therefore denies the same.

2477. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2477, and therefore denies the same.

2478. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2478, and therefore denies the same.

2479. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2479, and therefore denies the same.

2480. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2480, and therefore denies the same.

2481. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2481, and therefore denies the same.

2482. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2482, and therefore denies the same.

2483. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2483, and therefore denies the same.

2484. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2484, and therefore denies the same.

2485. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2485, and therefore denies the same.

2486. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2486, and therefore denies the same.

2487. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2487, and therefore denies the same.

2488. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2488, and therefore denies the same.

2489. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2489, and therefore denies the same.

2490. Apple denies the allegations in Paragraph 2490.

2491. Apple denies the allegations in Paragraph 2491.

2492. Apple denies the allegations in Paragraph 2492.

### **THIRTEENTH COUNT**

#### **(Infringement of the '664 patent)**

2493. Apple incorporates by reference its responses to Paragraphs 1-2492 of this Answer as if fully set forth herein.

2494. Apple denies the allegations in Paragraph 2494.

2495. Apple denies the allegations in Paragraph 2495.

2496. Apple denies the allegations in Paragraph 2496.

2497. Apple admits that Apple and Nokia signed a patent licensing agreement in June 2011. Apple denies all remaining allegations in Paragraph 2497.

2498. Apple denies the allegations of Paragraph 2498.

2499. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2499, and therefore denies the same.

2500. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2500, and therefore denies the same.

2501. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2501, and therefore denies the same.

2502. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2502, and therefore denies the same.

2503. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2503, and therefore denies the same.

2504. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2504, and therefore denies the same.

2505. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2505, and therefore denies the same.

2506. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2506, and therefore denies the same.

2507. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2507, and therefore denies the same.

2508. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2508, and therefore denies the same.

2509. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2509, and therefore denies the same.

2510. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2510, and therefore denies the same.

2511. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2511, and therefore denies the same.

2512. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2512, and therefore denies the same.

2513. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2513, and therefore denies the same.

2514. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2514, and therefore denies the same.

2515. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2515, and therefore denies the same.

2516. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2516, and therefore denies the same.

2517. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2517, and therefore denies the same.

2518. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2518, and therefore denies the same.

2519. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2519, and therefore denies the same.

2520. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2520, and therefore denies the same.

2521. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2521, and therefore denies the same.

2522. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2522, and therefore denies the same.

2523. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2523, and therefore denies the same.

2524. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2524, and therefore denies the same.

2525. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2525, and therefore denies the same.

2526. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2526, and therefore denies the same.

2527. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2527, and therefore denies the same.

2528. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2528, and therefore denies the same.

2529. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2529, and therefore denies the same.

2530. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2530, and therefore denies the same.

2531. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2531, and therefore denies the same.

2532. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2532, and therefore denies the same.

2533. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2533, and therefore denies the same.

2534. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2534, and therefore denies the same.

2535. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2535, and therefore denies the same.

2536. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2536, and therefore denies the same.

2537. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2537, and therefore denies the same.

2538. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2538, and therefore denies the same.

2539. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2539, and therefore denies the same.

2540. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2540, and therefore denies the same.

2541. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2541, and therefore denies the same.

2542. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2542, and therefore denies the same.

2543. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2543, and therefore denies the same.

2544. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2544, and therefore denies the same.

2545. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2545, and therefore denies the same.

2546. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2546, and therefore denies the same.

2547. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2547, and therefore denies the same.

2548. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2548, and therefore denies the same.

2549. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2549, and therefore denies the same.

2550. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2550, and therefore denies the same.

2551. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2551, and therefore denies the same.



2552. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2552, and therefore denies the same.

2553. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2553, and therefore denies the same.

2554. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2554, and therefore denies the same.

2555. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2555, and therefore denies the same.

2556. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2556, and therefore denies the same.

2557. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2557, and therefore denies the same.

2558. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2558, and therefore denies the same.

2559. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2559, and therefore denies the same.

2560. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2560, and therefore denies the same.

2561. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2561, and therefore denies the same.

2562. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2562, and therefore denies the same.

2563. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2563, and therefore denies the same.

2564. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2564, and therefore denies the same.

2565. Apple denies the allegations in Paragraph 2565.

2566. Apple denies the allegations in Paragraph 2566.

2567. Apple denies the allegations in Paragraph 2567.

#### **FOURTEENTH COUNT**

##### **(Infringement of the '689 patent)**

2568. Apple incorporates by reference its responses to Paragraphs 1-2567 of this Answer as if fully set forth herein.

2569. Apple denies the allegations in Paragraph 2569.

2570. Apple denies the allegations in Paragraph 2570.

2571. Apple denies the allegations in Paragraph 2571.

2572. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2572, and therefore denies the same.

2573. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2573, and therefore denies the same.

2574. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2574, and therefore denies the same.

2575. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2575, and therefore denies the same.

2576. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2576, and therefore denies the same.

2577. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2577, and therefore denies the same.

2578. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2578, and therefore denies the same.

2579. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2579, and therefore denies the same.

2580. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2580, and therefore denies the same.

2581. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2581, and therefore denies the same.

2582. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2582, and therefore denies the same.

2583. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2583, and therefore denies the same.

2584. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2584, and therefore denies the same.

2585. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2585, and therefore denies the same.

2586. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2586, and therefore denies the same.

2587. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2587, and therefore denies the same.

2588. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2588, and therefore denies the same.

2589. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2589, and therefore denies the same.

2590. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2590, and therefore denies the same.

2591. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2591, and therefore denies the same.

2592. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2592, and therefore denies the same.

2593. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2593, and therefore denies the same.

2594. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2594, and therefore denies the same.

2595. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2595, and therefore denies the same.

2596. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2596, and therefore denies the same.

2597. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2597, and therefore denies the same.

2598. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2598, and therefore denies the same.

2599. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2599, and therefore denies the same.

2600. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2600, and therefore denies the same.

2601. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2601, and therefore denies the same.

2602. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2602, and therefore denies the same.

2603. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2603, and therefore denies the same.

2604. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2604, and therefore denies the same.

2605. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2605, and therefore denies the same.

2606. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2606, and therefore denies the same.

2607. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2607, and therefore denies the same.

2608. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2608, and therefore denies the same.

2609. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2609, and therefore denies the same.

2610. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2610, and therefore denies the same.

2611. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2611, and therefore denies the same.

2612. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2612, and therefore denies the same.

2613. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2613, and therefore denies the same.

2614. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2614, and therefore denies the same.

2615. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2615, and therefore denies the same.

2616. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2616, and therefore denies the same.

2617. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2617, and therefore denies the same.

2618. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2618, and therefore denies the same.

2619. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2619, and therefore denies the same.

2620. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2620, and therefore denies the same.

2621. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2621, and therefore denies the same.

2622. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2622, and therefore denies the same.

2623. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2623, and therefore denies the same.

2624. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2624, and therefore denies the same.

2625. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2625, and therefore denies the same.

2626. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2626, and therefore denies the same.

2627. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2627, and therefore denies the same.

2628. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2628, and therefore denies the same.

2629. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2629, and therefore denies the same.

2630. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2630, and therefore denies the same.

2631. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2631, and therefore denies the same.

2632. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2632, and therefore denies the same.

2633. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2633, and therefore denies the same.

2634. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2634, and therefore denies the same.

2635. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2635, and therefore denies the same.

2636. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2636, and therefore denies the same.

2637. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2637, and therefore denies the same.

2638. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2638, and therefore denies the same.

2639. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2639, and therefore denies the same.

2640. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2640 and therefore denies the same.

2641. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2641, and therefore denies the same.

2642. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2642, and therefore denies the same.



2643. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2643, and therefore denies the same.

2644. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2644, and therefore denies the same.

2645. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2645, and therefore denies the same.

2646. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2646, and therefore denies the same.

2647. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2647, and therefore denies the same.

2648. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2648, and therefore denies the same.

2649. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2649, and therefore denies the same.

2650. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2650, and therefore denies the same.

2651. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2651, and therefore denies the same.

2652. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2652, and therefore denies the same.

2653. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2653, and therefore denies the same.

2654. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2654, and therefore denies the same.

2655. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2655, and therefore denies the same.

2656. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2656, and therefore denies the same.

2657. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2657, and therefore denies the same.

2658. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2658, and therefore denies the same.

2659. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2659, and therefore denies the same.

2660. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2660, and therefore denies the same.

2661. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2661, and therefore denies the same.

2662. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2662, and therefore denies the same.

2663. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2663, and therefore denies the same.

2664. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2664, and therefore denies the same.

2665. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2665, and therefore denies the same.

2666. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2666, and therefore denies the same.

2667. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2667, and therefore denies the same.

2668. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2668, and therefore denies the same.

2669. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2669, and therefore denies the same.

2670. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2670, and therefore denies the same.

2671. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2671, and therefore denies the same.

2672. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2672, and therefore denies the same.

2673. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2673, and therefore denies the same.

2674. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2674, and therefore denies the same.

2675. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2675, and therefore denies the same.

2676. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2676, and therefore denies the same.

2677. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2677, and therefore denies the same.

2678. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2678, and therefore denies the same.

2679. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2679, and therefore denies the same.

2680. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2680, and therefore denies the same.

2681. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2681, and therefore denies the same.

2682. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2682, and therefore denies the same.

2683. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2683, and therefore denies the same.

2684. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2684, and therefore denies the same.

2685. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2685, and therefore denies the same.

2686. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2686, and therefore denies the same.

2687. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2687, and therefore denies the same.

2688. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2688, and therefore denies the same.

2689. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2689, and therefore denies the same.

2690. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2690, and therefore denies the same.

2691. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2691, and therefore denies the same.

2692. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2692, and therefore denies the same.

2693. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2693, and therefore denies the same.

2694. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2694, and therefore denies the same.

2695. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2695, and therefore denies the same.

2696. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2696, and therefore denies the same.

2697. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2697, and therefore denies the same.

2698. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2698, and therefore denies the same.

2699. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2699, and therefore denies the same.

2700. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2700, and therefore denies the same.

2701. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2701, and therefore denies the same.

2702. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2702, and therefore denies the same.

2703. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2703, and therefore denies the same.

2704. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2704, and therefore denies the same.

2705. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2705, and therefore denies the same.

2706. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2706, and therefore denies the same.

2707. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2707, and therefore denies the same.

2708. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2708, and therefore denies the same.

2709. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2709, and therefore denies the same.

2710. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2710, and therefore denies the same.

2711. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2711, and therefore denies the same.

2712. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2712, and therefore denies the same.

2713. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2713, and therefore denies the same.

2714. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2714, and therefore denies the same.

2715. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2715, and therefore denies the same.

2716. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2716, and therefore denies the same.

2717. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2717, and therefore denies the same.

2718. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2718, and therefore denies the same.

2719. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2719, and therefore denies the same.

2720. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2720, and therefore denies the same.

2721. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2721, and therefore denies the same.

2722. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2722, and therefore denies the same.

2723. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2723, and therefore denies the same.

2724. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2724, and therefore denies the same.

2725. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2725, and therefore denies the same.

2726. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2726, and therefore denies the same.

2727. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2727, and therefore denies the same.

2728. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2728, and therefore denies the same.

2729. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2729, and therefore denies the same.

2730. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2730, and therefore denies the same.



2731. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2731, and therefore denies the same.

2732. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2732, and therefore denies the same.

2733. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2733, and therefore denies the same.

2734. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2734, and therefore denies the same.

2735. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2735, and therefore denies the same.

2736. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2736, and therefore denies the same.

2737. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2737, and therefore denies the same.

2738. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2738, and therefore denies the same.

2739. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2739, and therefore denies the same.

2740. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2740, and therefore denies the same.

2741. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2741, and therefore denies the same.

2742. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2742, and therefore denies the same.

2743. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2743, and therefore denies the same.

2744. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2744, and therefore denies the same.

2745. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2745, and therefore denies the same.

2746. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2746, and therefore denies the same.

2747. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2747, and therefore denies the same.

2748. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2748, and therefore denies the same.

2749. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2749, and therefore denies the same.

2750. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2750, and therefore denies the same.

2751. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2751, and therefore denies the same.

2752. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2752, and therefore denies the same.

2753. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2753, and therefore denies the same.

2754. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2754, and therefore denies the same.

2755. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2755, and therefore denies the same.

2756. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2756, and therefore denies the same.

2757. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2757, and therefore denies the same.

2758. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2758, and therefore denies the same.

2759. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2759, and therefore denies the same.

2760. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2760, and therefore denies the same.

2761. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2761, and therefore denies the same.

2762. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2762, and therefore denies the same.

2763. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2763, and therefore denies the same.

2764. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2764, and therefore denies the same.

2765. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2765, and therefore denies the same.

2766. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2766, and therefore denies the same.

2767. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2767, and therefore denies the same.

2768. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2768, and therefore denies the same.

2769. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2769, and therefore denies the same.

2770. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2770, and therefore denies the same.

2771. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2771, and therefore denies the same.

2772. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2772, and therefore denies the same.

2773. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2773, and therefore denies the same.

2774. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2774, and therefore denies the same.

2775. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2775, and therefore denies the same.

2776. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2776, and therefore denies the same.

2777. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2777, and therefore denies the same.

2778. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2778, and therefore denies the same.

2779. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2779, and therefore denies the same.

2780. Apple lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2780, and therefore denies the same.

2781. Apple denies the allegations in Paragraph 2781.

2782. Apple denies the allegations in Paragraph 2782.

#### **APPLE'S AFFIRMATIVE DEFENSES TO CORE WIRELESS' COMPLAINT**

On information and belief, Apple asserts the following defenses to Core Wireless' Complaint:

##### **First Defense (Non-Infringement)**

Core Wireless is not entitled to any relief against Apple because Apple has not directly or indirectly infringed any valid claim of the '277 patent, '347 patent, '181 patent, '959 patent, '271 patent, '321 patent, '143 patent, '850 patent, '679 patent, '045 patent, '860 patent, '022 patent, '664 patent, and '689 patent (the "Core Wireless Asserted Patents").

### **Second Defense (Invalidity)**

One or more of the claims of the Core Wireless Asserted Patents are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and 112.

### **Third Defense (Unenforceability and/or Authority to Practice)**

One or more of the Core Wireless Asserted Patents are unenforceable against Apple and/or Apple has the authority to practice these patents as a consequence of one or more of the following grounds: license (e.g., express and/or implied authority to sell or otherwise practice the accused devices or components therein) and any equitable and/or legal consequences arising therefrom; estoppel; laches; waiver; unclean hands; and/or other applicable legal and/or equitable doctrines. The Core Wireless Asserted Patents are subject to all preexisting legal and/or equitable encumbrances that Core Wireless assumed upon transfer of those patents and are subject to all legal and/or equitable consequences arising therefrom. As just one example, one or more of the Core Wireless Asserted Patents are unenforceable at least through waiver (and other applicable equitable doctrines) based on Nokia's failure to timely disclose them during the standard-setting process at the European Telecommunications Standards Institute ("ETSI") and the Third Generation Partnership Project ("3GPP").

### **Fourth Defense (Inequitable Conduct)**

On information and belief, the '347 patent is unenforceable due to inequitable conduct because persons associated with the prosecution of the '347 patent, including at least named inventor Esa Malkamaki ("Mr. Malkamaki"), failed to disclose information material to the

patentability of the claimed invention, with the intention of deceiving the United States Patent and Trademark Office (“USPTO”).

Specifically, the ’347 patent allegedly relates to a High Speed Downlink Packet Access (“HSDPA”) scheme that, at the time of the claimed invention, was being developed by the Third Generation Partnership Project (“3GPP”). (’347 patent, col. 1:8-16). Mr. Malkamaki participated in the relevant standard setting discussions through his involvement in Radio Access Network (“RAN”) Technical Specification Group (“TSG”) Working Group #1 (“WG1”), which was one of two Working Groups in the RAN TSG responsible for developing HSDPA. Through his participation in the working group, Mr. Malkamaki learned of two prior art HSDPA-related proposals that were highly material to the alleged invention claimed in the patent: (1) Tdoc R1-01-0705, *Alternatives for HS-DSCH-related downlink signaling* (“R1-01-0705”), written by Ericsson; and (2) Tdoc R1-01-0758, *Comments on the Requirement for UE ID when HS-DSCH Indicator (HI) bit is present for High Speed Downlink Packet Access (HSDPA) Downlink Signaling* (“R1-01-0758”), written by Motorola. However, Mr. Malkamaki failed to disclose either proposal to the USPTO. Had these documents been disclosed to the USPTO examiner responsible for the ’347 application, the examiner would have had grounds to reject the ’347 application under 35 U.S.C. § 102(f) and/or 35 U.S.C. § 103.

As purportedly described in the ’347 patent, in the HSDPA system, a base station sends information to a mobile station using at least three types of channels: “packet paging channel[s]” (*see* col. 3:65-66), “parameter signaling channels” (Abstract, col. 4:15-29), and shared data channels (Abstract, col. 3:21-22). The ’347 patent is allegedly directed to a particular scheme for sending information, using these three channels, from a base station to a mobile station. (’347 patent at col. 5:14-16). According to the patent, two alternate methods of sending

information using these channels had been proposed in the prior art, both of which had advantages and drawbacks. Under one proposal, the three channels would be sent in sequence; this proposal reduced hardware requirements at the cost of increased delay. ('347 patent at col. 4:51-67). Under the competing proposal, all three channels would be sent at the same time; this would reduce delay but increase hardware requirements. ('347 patent at col. 5:1-13). The '347 patent purported to provide a compromise approach that took less time than the first approach but that also used less hardware than the second approach. ('347 patent at col. 5:14-19). In addition, the '347 patent included the element of assigning one parameter signaling channel to the mobile station for the duration of the transmission. ('347 patent at col. 5:37-43).

The R1-01-0705 and R1-01-0758 proposals were highly material to the alleged inventions claimed in the '347 patent. R1-01-0705 presented various schemes for sending the paging channel (referred to as the "DPCH"), parameter signaling channels (referred to as "shared control channels" or as "HS-PDSCCHs"), and shared data channels (referred to as "HS-PDSCHs") from the base station to the user. In particular, R1-01-0705 disclosed a compromise approach of the type that the '347 patent claimed was needed. *See* R1-01-0705 at § 2.1.2 & Fig. 3. R1-01-0758 contained two proposals for how to assign a parameter signaling channel ("HS-PDSCCH") to a mobile station ("UE"), one of which was to use a "UE-specific CRC." R1-01-0705 at p. 3.

On information and belief, at least named inventor Mr. Malkamaki was aware of R1-01-0705 and R1-01-0758. R1-01-0705 was circulated to RAN WG1 via email on June 17, 2001 and was then presented to the RAN WG1 Release 5 Ad-Hoc Meeting on June 27, 2001. R1-01-0758 was also presented to the RAN WG1 Release 5 Ad-Hoc Meeting on June 27, 2001. Records of



that meeting indicate that Mr. Malkamaki was a participant in WG1 and attended the June 27, 2001 Release 5 Ad-Hoc Meeting.

Mr. Malkamaki knew or should have known (a) that R1-01-0705 and R1-01-0758 contained information that was highly material to the USPTO's consideration of the '347 patent; and (b) that R1-01-0705 and R1-01-0758 were not cumulative of other references before the USPTO. Under Core Wireless's apparent claim construction as evidenced in its 2<sup>nd</sup> Amended Infringement Contentions, R1-01-0705 and R1-010758 disclose, or at a minimum render obvious, all limitations of the two claims of the '347 patent asserted against Apple, claims 15 and 30. The minutes of the Release 5 Ad-Hoc Meeting state that the WG1 participants considered Nokia's version of the compromise approach – which was circulated two days after R1-01-0705 was circulated and which is similar to the invention described in the patent – to be “very close to” the compromise approach specified in R1-01-0705. Furthermore, in a proposal by Nokia to RAN WG1 that included the concept of assigning one control channel for the duration of the transmission, Nokia acknowledged that it adopted the UE-specific CRC concept from R1-01-0758 as the preferred mechanism for assigning a parameter signaling channel to a mobile station. See Tdoc R1-01-0827, *HSDPA DL channel structure* (“R1-01-0827”). Thus, R1-01-0705 and R1-01-0758 were material to the question of whether the '347 claims, including asserted claims 15 and 30, were novel. Furthermore, R1-01-0705 and R1-01-0758 were not cumulative of the other prior art before the USPTO. None of the prior art before the USPTO provided the same disclosure regarding the relative timing between the paging channels, the parameter signaling channels, and the data channels discussed in those references, nor did any of the other art provide the same suggestion of using a UE-specific CRC.

On information and belief, Mr. Malkamaki withheld R1-01-0705 and R1-01-0758 with the specific intent of deceiving the USPTO. Nokia filed U.S. Patent App. No. 09/935,212, which eventually issued as the '347 patent, on August 22, 2001. At this time, the first version of HSDPA was still being developed by the 3GPP RAN working groups. On information and belief, Mr. Malkamaki sought to convince the USPTO to grant a patent on his proposed technology – and to convince the relevant 3GPP RAN working group to write his proposal into the industry standards – so that companies practicing the standard would have to use the patent. However, this scheme could not work if the 09/935,212 application were rejected. Thus, on information and belief, Mr. Malkamaki deliberately withheld R1-01-0705 and R1-01-0758 from the USPTO. At the same time, Nokia delayed disclosing the 09/935,212 application to the 3GPP until June 27, 2003. These acts and omissions constitute inequitable conduct and render the '347 patent unenforceable.

### **FIRST AMENDED COUNTERCLAIMS**

Plaintiff-in-counterclaim Apple, on personal knowledge as to its own acts, and on information and belief as to all others based on its own and its attorneys' investigation, alleges its First Amended Counterclaims against Core Wireless as follows:

#### **NATURE OF ACTION**

1. These First Amended Counterclaims arise from Core Wireless's baseless allegation of infringement of the Core Wireless Asserted Patents and its assertion of those Patents in violation of its contractual obligations to license Apple to them.

2. Upon information and belief, Core Wireless claims to be the owner of all rights, titles, and interests in and to the Core Wireless Asserted Patents.

3. Core Wireless acquired any rights it has in the Core Wireless Asserted Patents from Nokia Corporation. Nokia is a member of the European Telecommunications Standards Institute (“ETSI”), a standard-setting organization that promulgates cellular telecommunications standards. In accordance with ETSI’s Intellectual Property Rights Policy, Nokia made binding and enforceable promises to ETSI and its members—including Apple—to license the Core Wireless Asserted Patents to companies supporting the UMTS standard promulgated by ETSI on “fair, reasonable, and non-discriminatory” or FRAND terms. Those FRAND promises traveled with the Core Wireless Asserted Patents when they were transferred to Core Wireless and continue to bind Core Wireless.

4. Despite and in breach of the binding contractual commitments obligating Core Wireless to license Apple to the Core Wireless Asserted Patents on FRAND terms, Core Wireless brought this infringement action before even approaching Apple to discuss a license, and since initiating this suit Core Wireless has refused to provide FRAND terms to Apple for the Core Wireless Asserted Patents.

5. An actual case or controversy exists between the parties concerning the infringement, validity, and enforceability of one or more of the claims of the Core Wireless Asserted Patents.

### **PARTIES**

6. Apple is a corporation organized under the law of the State of California and its principal place of business is in Cupertino, California.

7. According to Core Wireless’s Complaint, Core Wireless is a corporation duly organized and existing under the laws of the Grand Duchy of Luxembourg, having a principal place of business at 16, Avenue Pasteur L-2310 Luxembourg—

## **JURISDICTION AND VENUE**

8. The Court has jurisdiction over these Counterclaims pursuant to the Federal Patent Act, 28 U.S.C. §§ 1338(a), 2201, 2202, and 28 U.S.C. §§ 1331, 1337.

9. Core Wireless has subjected itself to personal jurisdiction by suing Apple in this District.

10. Apple continues to believe that the United States District Court for the Northern District of California is a more convenient venue for this case but has nonetheless brought these counterclaims in response to Core Wireless's claims.

## **FACTS**

### ***The FRAND Commitments of the Core Wireless Asserted Patents***

11. ETSI promulgated an Intellectual Property Rights ("IPR") Policy, set forth in Annex 6 of its Rule of Procedure to govern its standard setting activity. The ETSI IPR Policy requires, among other safeguards, that standard-setting participants claiming to own essential intellectual property rights commit to *declare* patents that may be essential to ETSI standards (under Clause 4 of the IPR Policy), and commit to *license* those IPR to any party supporting the the standard on FRAND terms (under Clause 6 of the IPR Policy). In relevant part, Clause 6.1 of the ETSI IPR policy states:

When an ESSENTIAL IPR relating to a particular STANDARD or TECHNICAL SPECIFICATION is brought to the attention of ETSI, the Director-General of ETSI shall immediately request the owner to give within three months an irrevocable undertaking in writing that it is prepared to grant irrevocable licenses on fair, reasonable and non-discriminatory [FRAND] terms and conditions under such IPR to at least the following extent:

- MANUFACTURE, including the right to make or have made customized components and sub-systems to the licensee's own design for use in MANUFACTURE;

- sell, lease, or otherwise dispose of EQUIPMENT so MANUFACTURED;
- repair, use, or operate EQUIPMENT; and
- use METHODS.

The above undertaking may be made subject to the condition that those who seek licenses agree to reciprocate.

12. The ETSI IPR Policy provides that it “shall be governed by the laws of France.”

13. The widely-deployed UMTS standard was developed at the Third Generation Partnership Project (“3GPP”), a standard-setting organization comprised of six regional telecommunications SSOs, including ETSI. Members of ETSI and the other SSOs participating at 3GPP self-declare patents as “essential,” or necessary to practice, the UMTS standard. (Organizations such as ETSI do not independently verify whether such patents are actually essential.)

14. Nokia is an ETSI member and declared the Core Wireless Asserted Patents as essential to UMTS through declarations submitted to ETSI. Those declarations by Nokia constituted irrevocable commitments to license on FRAND terms the Core Wireless Asserted Patents to all parties supporting the UMTS standard.

15. As an example, on October 6, 2008, Nokia submitted an IPR information statement and licensing declaration to ETSI in which it committed that it was “prepared to grant irrevocable licenses under the IPRs [identified in the declaration] on terms and conditions which are in accordance with the ETSI IPR Policy[.]” Among other IPR, the declaration identified a United States patent application that would later issue as the ’045 patent, one of the Core Wireless Asserted Patents, as essential to the UMTS standard. Further, the declaration provided that the “construction, validity and performance of this DECLARATION shall be governed by the laws of France.” This declaration bound Nokia and any subsequent owner of the ’045 patent

to license it on FRAND terms to parties supporting the UMTS standard. Nokia made the same binding FRAND commitment for each of the other Core Wireless Asserted Patents.

***Core Wireless's Acquisition of the Core Wireless Asserted Patents***

16. Nokia transferred rights in the Core Wireless Asserted Patents to Core Wireless in 2011.

17. Core Wireless acquired its rights in the Core Wireless Asserted Patents subject to the earlier FRAND promises to ETSI. Accordingly, Core Wireless is obligated to license the Core Wireless Asserted Patents on FRAND terms to any party supporting the UMTS standard.

***Core Wireless's Assertion of the Core Wireless Asserted Patents Against Apple***

18. Core Wireless initiated this action against Apple on February 29, 2012, asserting thirteen of the Core Wireless Asserted Patents (and later amended to add a fourteenth).

19. Prior to bringing this action, Core Wireless never made a FRAND licensing offer to Apple for the Core Wireless Asserted Patents. Core Wireless's assertion of the Core Wireless Asserted Patents before even attempting to engage in good faith negotiations with Apple constitutes a breach of its FRAND obligations as to each of those patents. On October 30, 2012, Apple requested that Core Wireless provide its FRAND rates for the Core Wireless Asserted Patents and information sufficient to assess whether those rates are actually fair, reasonable, and non-discriminatory. The information Apple requested included Core Wireless's FRAND royalty rate for each of the Core Wireless Asserted Patents, with each patent's rate separately listed; the methodology by which Core Wireless derived each rate; and confirmation that Core Wireless offered these same rates to other companies or that other companies paid these same rates, or if not the same, a description of the rates offered to or paid by other companies and a list of those companies.

20. Apple again wrote to Core Wireless on January 30, 2013, to request the information sought in Apple's letter of October 30, 2012, after Core Wireless failed to respond.

21. Since then, Core Wireless has never provided any terms specific to each of the Core Wireless Asserted Patents as Apple has repeatedly requested.

22. Core Wireless's refusal to provide FRAND license terms for each of the Core Wireless Asserted Patents constitutes a breach of its FRAND obligations, including a separate breach of its obligation to license on FRAND terms each of those patents.

### ***Harm to Apple***

23. Core Wireless's decision to bring this action before offering Apple a FRAND license for the Core Wireless Asserted Patents, as it was obligated to do, has harmed Apple.

24. Apple has been forced to defend an action for patents to which it is entitled to a FRAND license. Apple has incurred significant expenses defending this action.

## **CLAIMS FOR RELIEF**

### **FIRST CAUSE OF ACTION**

#### **(Declaratory Judgment of Non-Infringement of the '277 Patent)**

25. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-24 as if set forth fully herein.

26. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '277 patent.

27. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '277 patent.

### **SECOND CAUSE OF ACTION**

**(Declaratory Judgment of Invalidity of the '277 Patent)**

28. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-27 as if set forth fully herein.

29. One or more claims of the '277 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

30. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '277 patent is invalid.

**THIRD CAUSE OF ACTION**

**(Declaratory Judgment of Non-Infringement of the '347 Patent)**

31. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-30 as if set forth fully herein.

32. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '347 patent.

33. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '347 patent.

**FOURTH CAUSE OF ACTION**

**(Declaratory Judgment of Invalidity of the '347 Patent)**

34. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-33 as if set forth fully herein.



35. One or more claims of the '347 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

36. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '347 patent is invalid.

#### **FIFTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Non-Infringement of the '181 Patent)**

37. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-36 as if set forth fully herein.

38. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '181 patent.

39. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '181 patent.

#### **SIXTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Invalidity of the '181 Patent)**

40. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-39 as if set forth fully herein.

41. One or more claims of the '181 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

42. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '181 patent is invalid.

#### **SEVENTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Non-Infringement of the '959 Patent)**

43. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-42 as if set forth fully herein.

44. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '959 patent.

45. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '959 patent.

#### **EIGHTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Invalidity of the '959 Patent)**

46. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-45 as if set forth fully herein.

47. One or more claims of the '959 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

48. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '959 patent is invalid.

### **NINTH CAUSE OF ACTION**

#### **(Declaratory Judgment of Non-Infringement of the '271 Patent)**

49. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-48 as if set forth fully herein.

50. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '271 patent.

51. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '271 patent.

### **TENTH CAUSE OF ACTION**

#### **(Declaratory Judgment of Invalidity of the '271 Patent)**

52. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-51 as if set forth fully herein.

53. One or more claims of the '271 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

54. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '271 patent is invalid.

### **ELEVENTH CAUSE OF ACTION**

#### **(Declaratory Judgment of Non-Infringement of the '321 Patent)**

55. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-54 as if set forth fully herein.

56. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '321 patent.

57. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '321 patent.

#### **TWELFTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Invalidity of the '321 Patent)**

58. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-57 as if set forth fully herein.

59. One or more claims of the '321 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

60. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '321 patent is invalid.

#### **THIRTEENTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Non-Infringement of the '143 Patent)**

61. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-60 as if set forth fully herein.

62. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '143 patent.

63. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '143 patent.

#### **FOURTEENTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Invalidity of the '143 Patent)**

64. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-63 as if set forth fully herein.

65. One or more claims of the '143 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

66. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '143 patent is invalid.

#### **FIFTEENTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Non-Infringement of the '850 Patent)**

67. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-66 as if set forth fully herein.

68. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '850 patent.

69. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '850 patent.

## **SIXTEENTH CAUSE OF ACTION**

### **(Declaratory Judgment of Invalidity of the '850 Patent)**

70. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-69 as if set forth fully herein.

71. One or more claims of the '850 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

72. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '850 patent is invalid.

## **SEVENTEENTH CAUSE OF ACTION**

### **(Declaratory Judgment of Non-Infringement of the '679 Patent)**

73. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-72 as if set forth fully herein.

74. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '679 patent.

75. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is

entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '679 patent.

### **EIGHTEENTH CAUSE OF ACTION**

#### **(Declaratory Judgment of Invalidity of the '679 Patent)**

76. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-75 as if set forth fully herein.

77. One or more claims of the '679 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

78. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '679 patent is invalid.

### **NINETEENTH CAUSE OF ACTION**

#### **(Declaratory Judgment of Non-Infringement of the '045 Patent)**

79. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-78 as if set forth fully herein.

80. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '045 patent.

81. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '045 patent.

### **TWENTIETH CAUSE OF ACTION**

**(Declaratory Judgment of Invalidity of the '045 Patent)**

82. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-81 as if set forth fully herein.

83. One or more claims of the '045 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

84. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '045 patent is invalid.

**TWENTY FIRST CAUSE OF ACTION**

**(Declaratory Judgment of Non-Infringement of the '860 Patent)**

85. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-84 as if set forth fully herein.

86. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '860 patent.

87. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '860 patent.

**TWENTY SECOND CAUSE OF ACTION**

**(Declaratory Judgment of Invalidity of the '860 Patent)**

88. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-87 as if set forth fully herein.



89. One or more claims of the '860 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

90. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '860 patent is invalid.

### **TWENTY THIRD CAUSE OF ACTION**

#### **(Declaratory Judgment of Non-Infringement of the '022 Patent)**

91. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-90 as if set forth fully herein.

92. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '022 patent.

93. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '022 patent.

### **TWENTY FOURTH CAUSE OF ACTION**

#### **(Declaratory Judgment of Invalidity of the '022 Patent)**

94. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-93 as if set forth fully herein.

95. One or more claims of the '022 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

96. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '022 patent is invalid.

#### **TWENTY FIFTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Non-Infringement of the '664 Patent)**

97. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-96 as if set forth fully herein.

98. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '664 patent.

99. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '664 patent.

#### **TWENTY SIXTH CAUSE OF ACTION**

##### **(Declaratory Judgment of Invalidity of the '664 Patent)**

100. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-99 as if set forth fully herein.

101. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '664 patent is invalid.

102. One or more claims of the '664 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

**TWENTY SEVENTH CAUSE OF ACTION**

**(Declaratory Judgment of Non-Infringement of the '689 Patent)**

103. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-102 as if set forth fully herein.

104. Apple has not directly or indirectly infringed and is not directly or indirectly infringing any valid claim of the '689 patent.

105. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to declaratory judgment that it has not infringed and is not infringing any valid, enforceable claim of the '689 patent.

**TWENTY EIGHTH CAUSE OF ACTION**

**(Declaratory Judgment of Invalidity of the '689 Patent)**

106. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-105 as if set forth fully herein.

107. To resolve the legal and factual questions raised by Core Wireless and to afford relief from the uncertainty and controversy that Core Wireless' allegations have created, Apple is entitled to a declaratory judgment that the '689 patent is invalid.

108. One or more claims of the '689 patent are invalid for failing to meet one or more of the requisite statutory and decisional requirements and/or conditions for patentability under Title 35 of the United States Code, including without limitation, §§ 101, 102, 103, and/or 112.

## **TWENTY NINTH CAUSE OF ACTION**

### **(Breach of Contract)**

109. Apple repeats and realleges the allegations of the preceding counterclaim Paragraphs 1-108 as if set forth fully herein.

110. As alleged above, by committing to license its declared-essential patents on FRAND terms to all parties supporting the UMTS standard, Nokia entered into contractual commitments with ETSI, ETSI's members (including Apple), and suppliers of products that support the standard. These commitments imposed ongoing, continuing contractual obligations on the Core Wireless Asserted Patents. These commitments traveled with the patents when transferred, and Core Wireless is thus bound by these commitments with respect to the Core Wireless Asserted Patents.

111. Each party with products supporting the UMTS standard is also an intended third party beneficiary and obtains the benefits of these contractual commitments.

112. By refusing to offer Apple a FRAND license for the Core Wireless Asserted Patents before bringing this action, Core Wireless has breached the FRAND commitments for the Core Wireless Asserted Patents.

113. By failing to provide Apple with FRAND license terms for each of the Core Wireless Asserted Patents—even after bringing this action and after Apple has requested such terms—Core Wireless has breached its FRAND commitments for each of the Core Wireless Asserted Patents.

114. Core Wireless's breach has harmed Apple because it has forced Apple to defend this groundless infringement suit and incur substantial expense in doing so.

### **PRAYER FOR RELIEF**

WHEREFORE, Apple requests that the Court:

- (a) Dismiss the Complaint in its entirety, with prejudice;
- (b) Enter judgment in favor of Apple and against Core Wireless;
- (c) Declare that Apple has not infringed, and is not infringing, each of the Core Wireless Asserted Patents;
- (d) Declare that one or more of the claims of each of the Core Wireless Asserted Patents are invalid, void and/or unenforceable against Apple;
- (e) Award Apple damages for Core Wireless's breaches of its FRAND obligations on the Core Wireless Asserted Patents;
- (f) Grant Apple all reasonable attorneys' fees, experts' fees, and costs; and
- (g) Grant such further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff-in-counterclaim Apple hereby demands trial by jury on all issues so triable raised by Core Wireless's Complaint or by Apple's Answer and Counterclaims.

Dated: June 21, 2013

/s/ Joseph J. Mueller

Joseph J. Mueller

(Massachusetts Bar No. 647567)

John J. Regan

(Massachusetts Bar No. 415120)

Cynthia D. Vreeland

(Texas Bar No. 20625150,

Massachusetts Bar No. 635143)

Kate Saxton

(Massachusetts Bar No. 150150)

WILMER CUTLER PICKERING HALE

AND DORR LLP

60 State Street

Boston, MA 02109

(617) 526-6000

Eric Miller Albritton

ALBRITTON LAW FIRM

111 West Tyler Street

Longview, TX 75601

(903) 757-8449  
ema@emafirm.com

*Attorneys for Defendant Apple Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system pursuant to the Court's Local Rules on this day, June 21, 2013.

/s/ Joseph J. Mueller  
Joseph J. Mueller